

**Arkansas Department of Health  
Proposed Rules Pertaining to Arkansas Prescription Drug Monitoring Program  
Public Comments Received**

A public hearing was conducted January 8, 2016 at 10:00 a.m. in Room #801 of the Freeway Medical Tower, 5800 West 10<sup>th</sup> Street, Little Rock, Arkansas. Oral comments were received during the hearing, as follows.

No written comments were received by the deadline.

Response to oral comments from Rick and Camille Wilcox, Northwest Medical Transfer, and Jim and Audrey Dintelman, Elite Med Service:

<b>Comment</b>	<b>Response</b>
<p>Several Comments were received regarding Section V(C)(3), requiring two (2) licensed individuals to be on all permitted trucks. Specifically, the commenters felt that drivers could be utilized in the place of a second licensed EMSP on a basic level ambulance.</p>	<p>Arkansas follows the guidelines set forth by the Centers for Disease Control and Prevention (CDC). The CDC recommends that Ems employers ensure that EMS workers who operate ambulances are qualified and trained appropriately. Arkansas has a sufficient number of licensed EMPs to ensure this recommendation is met. Specifically, Arkansas 7,144 licensed providers throughout the state and this number has steadily increased over the last two years. On average, an additional 400 people gain licensure per year. The attached sheet contains the breakdown of providers in each county and their respective levels of licensure. This number was obtained through the provider's address, not necessarily the county where they are employed. IN addition, we have 754 personnel that reside out of the state and 36 that did not report.</p> <p>The majority of surrounding states also have the requirement that there be two (2) licensed EMPs in the basic ambulance. After interviewing the states surrounding Arkansas, the following information was determined: Texas, Oklahoma, Missouri, Tennessee, and Louisiana do not use</p>

	<p>drivers in any capacity. There must be two licensed personnel at EMT level or above at all times. Mississippi does license ambulance drivers but requires a course. The general recommendation for Mississippi is staffing an EMT or above.</p> <p>Texas-24,681 Paramedics, 3,582 Advanced EMTs, 32,236 EMTs, 825 ground services operating, BLS with MICU capabilities.</p> <p>Oklahoma-2,800 Paramedics, 735 Advanced EMTs, 5,091 EMTs, 181 ground services operating, Double Medic trucks are very common.</p> <p>Oklahoma's numbers are the closest to Arkansas, and they also require two licensed EMS providers to be present at all times.</p> <p>Missouri-8,140 paramedics, 16,603 EMTs, 216 ground services operating.</p>