

**EMERGENCY MEDICAL SERVICES AUTHORITY  
10901 GOLD CENTER DR. STE. 400  
RANCHO CORDOVA, CA 95670**

**TITLE 22, CALIFORNIA CODE OF REGULATIONS  
PARAMEDIC FEES: AMENDED SECTIONS 100164, 100167, AND 100172**

**INITIAL STATEMENT OF REASONS**

**INTRODUCTION**

In 1980, the Emergency Medical Services System and Prehospital Emergency Care Personnel Act were signed into law creating the Emergency Medical Services Authority (EMSA or Authority) and adding Division 2.5 Emergency Medical Services (Act) to the Health and Safety Code (Sections 1797-1799). This has been expanded through section 1857 through the following decades. EMSA is part of a two-tier system overseeing Emergency Medical Services. EMSA serves as the statewide oversight and a Local Emergency Medical Service Agency (LEMSA) provides oversight at the local level. Today, there are 33 LEMSAs in California. Most LEMSAs serve a single county, but other LEMSAs serve multiple counties.

As part of the Act, EMSA licenses and oversees EMT-P licenseholders or paramedics. This oversight includes investigating and disciplinary actions as might be necessary under the Act and Regulations. AB 450 (Statutes 2021, Ch. 450) creates the Paramedic Disciplinary Review Board (Board) within in EMSA, though operating autonomously. The Board is empowered to review any appeals of disciplinary action against paramedics taken by EMSA.

**PROBLEM STATEMENT**

AB 450 amended Health and Safety Code (Code) section 1797.112 to include the costs of maintaining and operating this Board would come from the Emergency Medical Services Personnel Fund (Fund). These new expenditures will completely deplete the Fund in short order as the Fund's only income is from licensure fees.

**ANTICIPATED BENEFITS**

This proposal raises all paramedic fees by \$65 to cover the new expenditures created by the new Board, thereby maintaining EMSA's duty to maintain the fund at the levels prescribed by section 1797.112 of the Code.

**SPECIFIC PURPOSE OF, AND RATIONALE FOR, EACH PROPOSED CHANGE**

**§100164** These are changes to the licensing forms which are incorporated by reference in this section. The forms provide the exact fee that is to be submitted with the specific form. These forms are being revised to reflect the new fee levels under 100172 and the changes to this section reflect the new version of the forms.

**§100167** As with section 100164, some of the same forms are listed in this section. In this instance, the changes to section 100164 were made via Section 100 filings to change the fees as provided in section 100172 as part of a phasing in of a fee increase. However, this section was not included in those filings. Therefore, this serves to also update the information in this section to reflect the current proposed versions of the forms listed in this section.

**§100172** In general, changes are made to the specific fees to reflect the raise of \$65. Additionally, all language that was used to phase in the previous increase is being repealed as it is not necessary, nor accurate. Another general change in the section is to the language to make it easier to read and understand, such as changing “the fee shall be...” to “the fee is...” to reflect common speech and terminology.

**§100172(b)(8)** This subsection is being repealed. As provided in the current subsection, the \$5 fee is already incorporated into the fee being charged. It is not necessary and can be confusing to the common person. Removing the subsection has no impact on the fees being charged. Repealing then requires the following subsection to be renumbered to maintain the logical flow of the regulations.

**§100172(b)(11)** In addition to being renumbered from 11 to 10 due to the repeal of subsection (8), this replaces “dishonored” with “returned” referring to checks that aren’t cashed due to lack of funds in the account. This is an update to the common term used by common people in the state.

#### **OTHER REQUIRED SHOWINGS – GOVERNMENT CODE §11346.2(b)(2)-(5)**

Studies, Reports, or Documents Relied Upon – Gov. Code §11346.2(b)(3): None

Reasonable Alternatives That Would Lessen the Impact on Small Business – Government Code §11346.2(b)(4)(B): None; the Fund’s only income source are fees charged to the license holders.

Reasonable Alternatives That Would Be Less Burdensome and Equally Effective – Government Code §11346.2(b)(4)(A): No such alternatives have been identified, however, EMSA welcomes comments from the public.

Evidence Relied Upon to Support the Initial Determination That the Regulation Will Not Have a Significant Adverse Economic Impact on Business – Government Code § 11346.2(b)(5): The fees are charged to licensees, who are individuals, not businesses. While a business might choose to pay the fees on behalf of the individual, that is a choice made by the business, not a requirement.

**ECONOMIC IMPACT STATEMENT – GOVERNMENT CODE § 11346.3(b)(1)(A)-(D)**

The proposed regulations raise the licensing fees for paramedics. These are individual persons, not businesses. This would not create jobs, eliminate jobs, create businesses, eliminate businesses, or expand businesses. This will not benefit the health and welfare of California residents, worker safety, or the state's environment. Its sole purpose is to cover the costs of maintaining and operating the new Board created by AB 450.