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Public Comment and CCCEMSA Response

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Document Name: Policy 7003 – EMT Training Program Approval

Reference	Comment	Response
	Overreaching and Legally Questionable Local Authority Policy 7003 appears to go far beyond the authority granted to Local EMS Agencies under Title 22 CCR and the California Health & Safety Code §1797. CCCEMSA is authorized to approve and monitor local training programs, but the policy introduces excessive requirements and micromanagement—including internal policy mandates, fixed clinical site ratios, and documentation burdens—that are not mandated by the state. Contra Costa is not a regulatory body above the California EMS Authority, and should not be setting standards that functionally exceed or conflict with those already established statewide.	CCCEMSA is the local regulatory and approving authority that approves Contra Costa County based EMT training programs. The draft policy proscribes the requirements for submitting the required documents and items required for training program approval and memorializes the existing criteria and standards used for approving EMT training programs.

II.G	2. Blanket Bans on Out-of-State Programs Are Unjustified Section II.G's ban on out-of-state EMT programs affiliating with California-based clinical/field sites is arbitrary and restricts access to students who may live, work, or plan to certify in California. This exclusion lacks any legal basis in Title 22 CCR and may violate principles of interstate commerce and educational fairness.	Out of state training programs who are not approved in California are not authorized by the regulations to conduct EMT training in California. Students conducting their clinical experience in California must be associated with an approved California EMT training program, because the clinical field experience is part of EMT training.
	3. Intrusive and Disruptive Site Inspections Section II.N and IV.D allow for unannounced site inspections, including during live classroom instruction or clinical activity. While accountability is important, random on-site interventions disrupt learning, undermine instructors' authority, and create an atmosphere of surveillance and fear—not one of growth and collaboration. Education thrives in a supportive environment, not under the constant threat of interruption and disciplinary review.	The regulations authorize site visits. (22 CCR § 100122.01.) The regulations do not require that the site visits be pre-announced. CCCEMSA has been conducting announced and unannounced site visits for over 15 years. The section of the draft policy formalizes CCCEMSA's existing practices.
	4. Unrealistic Equipment and Infrastructure Standards The policy's language regarding "commercial locations," expansive equipment requirements, and the expectation for pristine, unused clinical equipment (Section II.L and elsewhere) creates an unrealistic barrier for smaller programs or public institutions, particularly community colleges and safety agencies operating on limited budgets. Not every training center has the means to purchase redundant, showroom-	The draft policy does not require the use of "pristine" equipment. There are no requirements for equipment in Title 22. This section of the policy does not impose any standards of training programs that does already exist or that are not already required for existing training programs.

	condition gear when functional equipment already meets Title 22 minimums. These added local demands risk excluding otherwise high-quality programs simply because they don't have the financial backing of a large institution. That hurts students—and ultimately, the EMS system.	
	5. Disciplinary Action with No Appeal Section VII.G states that probation, suspension, or revocation of training program approval is "not subject to appeal." This is fundamentally unjust and out of alignment with administrative due process. Every program deserves the opportunity to present its case, respond to allegations, and be heard before having its authorization stripped. This clause alone may deter qualified educators and institutions from ever attempting to work in Contra Costa County.	The regulations do not provide for an appeal of administrative action taken against training programs.