



## FINDINGS AND ORDER OF THE INDIANA DEPARTMENT OF HOMELAND SECURITY

### EMT COURSE CLINICAL EDUCATION REQUIREMENTS DURING COVID-19 GENERAL WAIVER ORDER #4

**TO: ALL TRAINING INSTITUTIONS & OFFICIALS ALL EMS PRIMARY INSTRUCTORS**

**ORDER NUMBER: W0092-2020**

Pursuant to the authority of Indiana Code § 4-21.5-3-6 and Indiana Code § 16-31-3-5, the Indiana Department of Homeland Security (Department) enters this Findings and Order in response to the COVID-19 public health emergency and with regard to the operational rules for the certification held by or being issued to Indiana EMS provider organizations.

The COVID-19 public health emergency has created potential challenges for the emergency services providers and educators of Indiana. This Order clarifies what blanket educational waivers are being issued generally. More specific waiver requests may be submitted for consideration as needed.

#### I. FINDINGS

Upon review of all the information available to staff and after consultation with several EMS providers, the staff of the EMS Section of the Department finds that:

The circumstances of the public health emergency demonstrate that:

- (1) compliance with the rule will impose an undue hardship on the Applicant; and
- (2) either:
  - (A) noncompliance with the rule; or
  - (B) compliance with an alternative requirement approved by the Department; will not jeopardize the quality of patient care.

Pursuant to 836 IAC 4-4-1(a) (2) the emergency medical technician (EMT) course is the one approved by the Indiana EMS Commission. The Indiana EMS Commission has determined the EMT curriculum through prior actions and defined the clinical education requirements. During the COVID-19 public health emergency, nearly all hospitals and most EMS provider organizations have halted student clinicals due to the limited PPE resources. There are limited alternatives other than those of this Waiver. Delaying candidates for only the clinical experience is not reasonable given the need for additional EMS personnel in the workforce.

Since the Governor's Executive Order #20-19 that was issued on April 7, 2020, the Department has issued nearly 20 individual training institution waiver orders (several with multiple courses per application) for waiving clinical education requirements for EMT courses. The volume of these waivers and similarity in content indicate that it is not efficient for either training institution staff or the Department. The similarities in these individual waiver orders are being incorporated into this General Waiver Order which will also supersede the individual waiver orders where there are differences.

The Governor's Executive Order #20-19 suspends IC 16-31-3-5 in order to allow the Department to be able to waive education requirements as necessary.

The expiration date of June 30, 2021, has been selected due to the extended projections that COVID-19 will continue to impact the United States, but also because EMS courses are planned in advance and adding some consistency and a defined timeline would help training institutions with course planning. It is also noted that many EMT courses last nearly 180 calendar days from beginning to end of course testing.

## II. ORDER

Based upon the Findings set forth above, the Department orders the following:

1. For clarification, the General Waiver Orders previously issued remain in effect and continue to be contemporaneously renewed with each extension of the Governor's public health emergency Executive Orders.

### EMS EDUCATION

2. **DIDACTIC EDUCATION:** All forms of EMS didactic education instruction are left to the Training Institution which should evaluate state and local health department guidance for appropriateness of in-person sessions and social distancing.
3. **PSYCHOMOTOR EXAMINATION:** All EMR and EMT psychomotor examinations are permitted to continue but must conform with the maximum number of individuals gathered in a place as permitted by state or local law/emergency health order. Furthermore, social distancing practices should be exercised as well.
4. **CLINICAL EDUCATION:** Applicable to all previously approved EMT courses not yet completed as well as all EMT courses approved (assigned a course number) and initiated before June 30, 2021, the clinical education requirements for the EMT courses shall be:
  - a. Eight (8) hours minimum ambulance clinical experience.
  - b. Additional clinical experience is encouraged and left to the discretion of the Training Institution and may include additional ambulance clinical time and hospital emergency department observation.
  - c. Each student in an EMT class shall obtain ten (10) patient contacts total.
    - i. At least three (3) of the patient contacts must be on live patients.
    - ii. The remainder may be obtained through simulation experience.

- iii. A contact must be a one-on-one interaction between an approved instructor and a student, done either in person or virtually, during which a full EMS patient assessment scenario is simulated and the student performance monitored. Feedback must then be given to each student. Each patient contact should be documented for verification purposes.
- d. While a public health emergency still exists, if a Training Institution is unable to provide any ambulance clinical opportunity due to the public health emergency (lack of ambulance provider, lack of PPE), then the Training Institution must report in writing to the Department that the class will have no ambulance clinical experience within 14 days of the start of the class. This notification should include:
  - i. The Training Institution name and certification number.
  - ii. The affected course number(s).
  - iii. Explanation of the inability to adequately provide ambulance clinical experience and alternatives that were considered.
  - iv. Explanation of the substitute experience that is proposed to satisfy a clinical education experience, such as a virtual simulation experience or simulations in a mockup ambulance, etc.
- e. The Department reserves the right to reject the explanation, in which case the Training Institution would then have to file a formal Waiver Order Application for consideration. A denial of this Waiver Order Application would create an appeal process opportunity for the Training Institution.

### III.

#### EFFECTIVE DATE OF FINDINGS AND ORDER

This Order is effective immediately and will expire June 30, 2021. This Order may also be rescinded by further Order if the COVID-19 public health emergency ends.

**SO ORDERED.**



By: Kraig Kinney, Director and Counsel  
Emergency Medical Services  
Indiana Department of Homeland Security



Date