

February 14, 2014

Texas Higher Education Coordination Board  
1200E. Anderson Lane  
Austin, Texas 78752

Dear Coordination Board,

The Governor's EMS and Trauma Advisory Council - Education Committee has examined S.B. 497, which amends Sec. 61.05151, of the Education Code, that will reduce the number of college semester credit hours of an Associate of Applied Science degree (AAS) to 60 hours effective Fall 2015.

Paramedic programs in Texas and in 47 other states are accredited by Commission on Accreditation of Allied Health Education Programs (CAAHEP) on recommendation from the Committee on Accreditation of Educational Programs for the Emergency Medical Services Professions (CoAEMSP). CAAHEP reports there are 35 accredited programs in Texas, with 28 of them offering an AAS degree. Twenty-six (26) of these programs currently exceed the proposed 60 hour requirement.

The standards and guidelines from the CoAEMSP do not specify a minimum or maximum number of credit hours for accredited programs. However, standard C.3 states, "The curriculum must ensure the achievement of program goals and learning domains. Instruction must be an appropriate sequence of classroom, laboratory, clinical and field/internship activities."

In Texas, EMS rule 157.32 states, "the minimum paramedic curriculum shall include all content required by the current national paramedic educational standards and competencies in the National EMS Education standards." This rule took effect January 1, 2013, and it ties national accreditation to Texas paramedic programs.

S.B. 497 allows for an exception to the 60 hour requirement for "compelling academic reasons." According to the Texas Higher Education Coordinating Board (THECB), a "compelling academic reason" is a justification for an associate's degree program consisting of more than 60 semester credit hours. Acceptable justifications are programmatic requirements, statutory requirements, and requirements for license/certification of graduates.

The Education Committee makes the following justifications in support of the allowed exception.

#### *Transferability (Programmatic)*

The 60 hour requirement places significant difficulty on the transferability of the associate degree graduate to a bachelor degree program. The THECB requires 15 credit hours of core content in each AAS degree and 42 credit hours of core content in a bachelor's degree. This difference of 27 credit hours in core curriculum between the two degrees adds a fifth year, or more, to the completion of the bachelor degree program.

#### *Affordable Care Act (Statutory)*

EMS providers are “experts in remote care.”<sup>1</sup> As we support the growth of our profession we must realize that there will be a significant need for associate degree paramedics to expand into a community based preventive medicine practice to reduce the cost of healthcare and augment better delivery system of healthcare.

At a time when EMS is expected to expand its roll into community health and critical care, reduction of semester credit hour requirements is counter-intuitive.

#### *Independent Practitioner (Licensing)*

Even though paramedics are not licensed as independent practitioners, they function in an autonomous role under the supervision of a distant medical director through delegated practice. Paramedics must be able to use critical thinking skills, problem solving, and decision making skills in the field. The education of paramedic personnel must include a solid foundation that will allow them to deliver competent patient care. Education is the key factor in providing proficient care for our patients and enhancing the ability of the physician to improve patient outcomes.

#### *Industry Growth*

The desire to standardize associate degrees is appreciated; however a 60 credit hour mandate limits the needed growth within the profession. The difference between a certificate-prepared and an associate degree-prepared paramedic should be in the areas of leadership, supervision, management, critical care, community health, research, and beyond.

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<sup>1</sup> McCallion, T. (2012) “Healthcare Reform Seen as Unparalleled Opportunity for EMS.” JEMS.

Excellence

EMS education is establishing consistency in cognitive, psychomotor, and affective domains. Texas Department of State Health Services, GETAC, National Association of EMS Educators, The Department of Transportation and many other organizations are working through the education standards and accreditation to assure competent clinicians. Requiring programs to reduce their paramedic curriculum to 60 hours would not be in the best interest of the citizens and communities we serve.

Based on these recommendations, the Education Committee respectfully requests GETAC to support the exception to allow paramedic associate degree programs to standardize at 68 to 70 credit hours. The Education Committee believes these justifications to be “compelling academic reasons.”

On February 14, 2014 GETAC voted unanimously to support this justification for compelling academic reasons.

Sincerely,

Vance Riley  
GETAC Chairman

Jodie Harbert, LP  
Education Chair  
GETAC Council Member