

Comments Upon Agenda Items

Received by the posted 4:30pm deadline on February 2nd

Planning and Operations

Verbal Comments to be presented at meeting:

No individuals requested to provide verbal comments upon any agenda items.

Written Comments only:

Agenda Item – Reserve Vehicles, Backup Vehicles, and Out of Service

- Dave Johnston – Reno County EMS
- Frank Williams – Butler County EMS

Education, Examination, Training, and Certification

Verbal Comments to be presented at meeting:

No individuals requested to provide verbal comments upon any agenda items.

Written Comments only:

Agenda Item – Adoption of 109-11-8

- Summary of Comments received during Public Comment Period

Agenda Item –BLS Skills Exam Equipment

- Meghan Graham – WSU Tech
- Chris Cannon – Cowley College
- Chris Cannon – KEMSA Educator’s Society
- Evan Seiwert – Butler Community College

Agenda Item – Qualified Instructors

- Chris Cannon – Cowley College (included with above comment)

Full Board

Verbal Comments to be presented at meeting:

No individuals requested to provide verbal comments upon any agenda items.

Written Comments only:

No written comment except for what was already provided for the items above.

Planning and Operations



Reno County Emergency Medical Service
at Hutchinson Regional Medical Center

January 30, 2026

Dear Members of the Kansas Board of EMS

I am writing to express support for the Board's ongoing discussion regarding Reserve Vehicles, Backup Vehicles, and Out of Service Vehicles, and to encourage a common-sense approach to ambulance licensing requirements for units that are designated as spare or backup within a larger fleet.

Reno County EMS operates in the same reality many agencies face once a fleet reaches a certain size: backup ambulances are essential to keeping the frontline fleet operational, but they are not routinely placed into daily service. While it is technically possible that every licensed ambulance in a fleet could be pushed into service, the truth is that this would be exceptionally rare outside of the largest regional or statewide incidents. In day-to-day operations, spare units exist primarily to mechanically support fleet readiness through rotation, maintenance coverage, and continuity of service.

In practice, agencies rotate ambulances in and out of service on a frequent basis—often weekly—due to maintenance needs, unexpected mechanical issues, repairs, and other operational realities. This is not an unusual exception; it is how EMS systems maintain reliability and avoid service failures.

I fully support the Board's responsibility to ensure public safety and maintain public trust in the statewide EMS system. The public has every right to expect that an ambulance responding to an emergency is properly staffed, properly maintained, and equipped to deliver appropriate care and transport. However, applying an "all-or-none" compliance approach to every fleet ambulance—regardless of whether it is a frontline unit or a true backup—creates unnecessary administrative burden and cost without proportionate benefit to patient outcomes.

As part of this discussion, I also recommend that agencies not be required to identify specific vehicle numbers or designate exactly which ambulances are "spare" or "backup" units at all times. Fleet management is dynamic by necessity, and which unit is frontline versus backup may change frequently due to maintenance rotation, repairs, mileage balancing, and operational demands. Requiring an agency to continually notify or refile changes with a regulatory body in order to remain compliant is not realistic for day-to-day operations.



Reno County Emergency Medical Service
at Hutchinson Regional Medical Center

Instead, I suggest a more practical approach: allow agencies to simply report the total number of frontline ambulances and the total number of spare/backup ambulances within their fleet. For example: Reno County EMS operates 6 frontline ambulances and 2 spare units. This supports accountability and transparency while allowing agencies to manage fleet rotation efficiently without excessive administrative reporting.

I respectfully request that the Board support a structure that clearly distinguishes between frontline response ambulances and those that are legitimately held in reserve/backup status, as discussed in the concept of adding defined categories beyond “out of service.” A workable and realistic framework would allow agencies to maintain backup units that are safe, mechanically sound, and ready to be placed into service when needed—without requiring constant regulatory oversight or forcing agencies into an equipment standard that does not match the unit’s intended operational role.

Thank you for your continued work on this issue and for considering changes that support both patient safety and practical fleet operations. Reno County EMS appreciates the Board’s efforts to modernize and clarify definitions and expectations in a way that protects Kansans while recognizing the operational realities faced by agencies across our state.

Respectfully

Dave Johnston, Chief, Reno County EMS



BUTLER COUNTY
EMERGENCY MEDICAL SERVICES

FRANK WILLIAMS
Director

Dear Kansas Board of EMS board members and staff,

I am writing to express support for the Kansas Board of EMS discussion focused on Reserve Vehicles, Backup Vehicles, and Out of Service Vehicles. This important operational resource is crucial to EMS readiness and response to our communities in Kansas. Ensuring EMS agency leaders are part of these direct impact discussions will hopefully provide insight on a flexible solution to ambulance licensing requirements for units that are designated as spare or backup within any EMS agency across Kansas.

Butler County EMS operates, much like many agencies, a limited fleet of ambulances to maintain response readiness. This includes maintaining reserve/spare/back-up ambulances to meet the demand and expectations of emergency response within our community. These spare ambulances have been maintained for decades at a 90% readiness level to support our first-out/front-line ambulances. This allows for EMS operational flexibility in our very dynamic responsibilities of emergency response. Much like having back-up EMS patient care tools on one ambulance to provide high quality patient care, reserve/spare/back-up ambulances increase the level of prehospital patient care to our community while being fiscally responsible. These ambulances primarily support daily operations by replacing first-out/front-line ambulances that require preventative and sometimes emergency maintenance to maintain mission readiness.

I fully respect and support the Board's responsibility to ensure public safety and maintain public trust in the statewide EMS system. The public has every right to expect that an ambulance responding to an emergency is properly staffed, properly maintained, and equipped to deliver appropriate care and transport. Along with these expectations and accountability, there must be a balance with local control to sustain overall emergency operations. In addition to fleet maintenance needs, spare/back-up/reserve ambulance play a role in mass causality incidents and EMS disaster preparedness.

I would request that funding by local tax payers be considered when creating and enforcing specific regulations and statutes. As an example, to meet the recent expectations of the Kansas Board of EMS of outfit our spare ambulances in Butler County with identical front-line medical equipment will cost the tax payers an additional (estimated) \$297,000.00 initially. This initial cost does not include ongoing maintenance and replacement cost of this spare medical equipment.

Here are some recommended solutions to allow local control in our dynamic EMS environment; allow agencies to simply report the total number of frontline ambulances and the total number of spare/backup ambulances within their fleet. For example: Butler County EMS operates 6 frontline ambulances and 3 spare units. This supports accountability and transparency while allowing agencies to manage fleet rotation efficiently without excessive administrative reporting.

Thank you for your continued work on this issue and for considering changes that support both patient safety and dynamic fleet operations that directly affect our ability to care for our community. I look forward to providing any additional information and being allowed to participate in these discussions.

Respectfully submitted,

Frank Williams RN, BSN, Paramedic

EMS Chief

701 N. Haverhill Rd. • El Dorado, KS 67042
316-322-4262 • www.bucoks.com

***Education, Examination, Training and
Certification***

Summary: 12 total provided support (11 written, 1 verbal); and 1 provided they had no comment. No opposition.

Support

You have 9 entities who submitted identical written comments:

Barber County, Edwards County, Ellinwood, Harper County, Hutchinson Community College, Junction City Fire, Pottawatomie County, Tech's Inc., and Paul Misasi.

Julie Talbert submitted very similar comments, but also attempted to apply it to her practice (albeit an examination not impacted by this change).

Cowley College submitted similar comments to those previously stated.

No Comment

The Kansas Legislature Joint Committee on Administrative Rules and Regulations (JCARR) submitted a comment they have no comment upon this proposed regulation.

Public Hearing – February 3, 2026 – 10:00 am (Rm 560 – Landon Building and Virtual)

Public Hearing commenced at 10:00am with Joe House, KBEMS Executive Director presiding as the hearing officer. Chris Cannon representing Cowley College and the KEMSA Educator Society was in virtual attendance. No other attendees. Mr. Cannon provided proponent testimony consistent with the written comment received from Cowley College. No testimony provided in opposition or neutral and the hearing concluded at 10:05 am.

NOTE:

There was no evidence provided to support the comments this change will increase or improve outcomes nor was there evidence provided to support it will positively impact workforce development.

It does, however, run an increased risk of additional compliance issues from educational programs approving their students to take the cognitive examination to an external party (NREMT) without submitting notification to the Board of successful course completion (as noted in the table below, these compliance issues exist today – 43 individuals made their 1st attempt within 7 days of the course end date over the last 2 complete calendar years).

Data: Highest number of students test between Days 9-16 – 387 with a 77% pass rate. Second highest number of students test between Days 18-24 – 284 with a 73% pass rate. Highest pass rates on days 10 – 86%, 11 – 86%, 17 – 94%, and 31 – 90%. Days 7, 8, and 9 represent 123 total students – 76%, 75%, and 76% respectively.¹

¹ 1748 students with a course ending in 2024 or 2025 and a 1st attempt at the cognitive made after the course ended and prior to today.

K.A.R. 109-11-8 – PUBLIC COMMENT SUMMARY / INFORMATION

Our data is consistent in showing pass rates steadily decrease beginning around day 25 (with days 31 and 35 being strong outliers).

Time Period	Pass Rate	Students Testing
1-6 days	69.8%	43
7-14 days	77.0%	365
15-21 days	76.5%	289
22-30 days	66.2%	299
31-60 days	61.1%	316
61-90 days	61.1%	95
91-180 days	68.1%	188
181-364 days	69.4%	121
365+ days	81.3%	32

Board Staff Recommendation

Board staff recommends the Board adopt K.A.R. 109-11-8 as presented.

In making this recommendation, Board staff notes there is always a risk of additional compliance issues with any change and pass rates over the last 2 calendar years are lower for those who tested less than 7 days from the last date of class. However, neither of these factors weighs into the facts this change eliminates a requirement for which there is no longer justification it needs to exist and there was no voiced opposition or neutral testimony to the changes as presented, solely support.

Attachments:

Written public comment:

- Mike Loreg, Barber County EMS
- Greg Barnes, Edwards County Medical Center
- Brittney Bailey, Ellinwood EMS
- Jan Harding, Harper County EMS
- Cliff Moore, Hutchinson Community College
- Kent Vosburg, Junction City Fire/EMS
- Brian Huntzinger, Pottawatomie County EMS
- Donna Connell, Tech's Inc.
- Paul Misasi
- Julie Talbert
- Chris Cannon, Cowley College

From: [Mike Loreg](#)
To: [Joseph House \[BEMS\]](#)
Subject: Support for Proposed Amendment to K.A.R. 109-11-8
Date: Wednesday, January 28, 2026 1:48:01 PM

EXTERNAL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed amendment to K.A.R. 109-11-8, which would eliminate the seven-day waiting period between course completion and eligibility to challenge the cognitive examination for EMS certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already ensure that students have met all competency, course completion, and readiness requirements prior to authorizing examination eligibility. Imposing an additional fixed delay does not enhance patient safety, examination integrity, or educational outcomes.

Eliminating this waiting period would improve efficiency, reduce unnecessary barriers for students, and allow candidates to test while course material remains fresh. Additionally, this change supports workforce development by enabling newly trained EMS providers to complete certification and enter service more promptly an important consideration given ongoing staffing challenges across Kansas.

The proposed amendment maintains all existing program approval standards and examination safeguards while removing an arbitrary time-based requirement that has not been shown to improve outcomes. For these reasons, I respectfully urge adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your time and consideration.

Mike Loreg / Director
Paramedic / RN



Office: 620-825-4112

Cell: 620-474-9812

Email: mloreg@barber.ks.gov

From: [Greg Barnes](#)
To: [Joseph House \[BEMS\]](#)
Subject: Support of proposed Change
Date: Wednesday, January 28, 2026 2:09:12 PM
Attachments: [Outlook-o1dtnfs4.png](#)

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Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity.

Eliminating the waiting period improves efficiency, reduces unnecessary barriers, and allows students to test while knowledge remains fresh. It also supports workforce development by enabling newly trained EMS providers to credential and enter service more promptly, an important consideration given ongoing staffing challenges across Kansas.

The proposed change preserves all existing program approval and examination safeguards while removing an arbitrary time-based restriction that has not been shown to improve outcomes. For these reasons, I respectfully support adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your consideration.

Sincerely,

Thank you!



Greg Barnes

Paramedic/Program Manager

620-659-3621 ext. 530

gbarnes@edcomed.com

EDWARDS COUNTY
Medical Center

"Providing Compassionate Health Care Close to Home."



Age-Friendly
Health Systems

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Dear Sirs:

RE: Support for Proposed Change to K.A.R. 109-11-8

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 that would eliminate the seven day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not serve any prudent advantage to the student or the EMS services. They have already proven they are ready by completing their programs prior to testing.

By eliminating the waiting period it would allow the students to test while the information is fresh, they are in the mindset of education and testing, it would decrease stress by not having to wait so long and would most likely increase the success rate and would help out the employers who have sponsored these individuals and are needing them to enter the workforce with their certifications sooner. Working with students during their class time and testing is a burden on most EMS services.

I can see no detrimental side if the 7 day wait period were to be eliminated. I sincerely support the proposed change.

Jan Harding

HCEMS Director

Harper County Kansas

From: ellinwoodems@cityofellinwood.com
To: [Joseph House \[BEMS\]](#)
Subject: RE: KAR 109-11-8 Support
Date: Wednesday, January 28, 2026 1:44:41 PM

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Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity.

Eliminating the waiting period improves efficiency, reduces unnecessary barriers, and allows students to test while knowledge remains fresh. It also supports workforce development by enabling newly trained EMS providers to credential and enter service more promptly, an important consideration given ongoing staffing challenges across Kansas.

The proposed change preserves all existing program approval and examination safeguards while removing an arbitrary time-based restriction that has not been shown to improve outcomes. For these reasons, I respectfully support adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your consideration.

Sincerely,

Brittney Bailey – AEMT, CPM
Ellinwood EMS – Director
209 W 1st Street – PO Box 278
Ellinwood, KS 67526
Office: 620-564-2408

From: Cannon, Chris <chris.cannon@cowley.edu>
Sent: Wednesday, January 28, 2026 1:35 PM
To: Cannon, Chris <chris.cannon@cowley.edu>
Cc: Joseph House [BEMS] <Joseph.House@ks.gov>
Subject: KAR 109-11-8 Support

Hello,

I'm writing to encourage everyone involved in EMS initial education to submit written testimony in support of the proposed changes to KAR 109-11-8 as developed by the KSBEMS that would eliminate the 7-day waiting period for cognitive examinations.

The public hearing for this regulation is NEXT WEEK on 2/3/26. I'd recommend sending any supporting documents via email to Joe House (copied above) ASAP.

Below is a sample letter of support, feel free to adapt as needed:

Re: Support for Proposed Change to K.A.R. 109-11-8

Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity.

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The proposed change preserves all existing program approval and examination safeguards while removing an arbitrary time-based restriction that has not been shown to improve outcomes. For these reasons, I respectfully support adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your consideration.

Sincerely,

Thank you!

Chris Cannon

Department Chair

EMS Program Director

Cowley College

1406 E. 8th

Winfield, KS 67156

620-229-5985

www.cowley.edu/paramedic

www.facebook.com/cowleyems



January 29, 2026

Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity.

Eliminating the waiting period improves efficiency, reduces unnecessary barriers, and allows students to test while knowledge remains fresh. It also supports workforce development by enabling newly trained EMS providers to credential and enter service more promptly, an important consideration given ongoing staffing challenges across Kansas.

The proposed change preserves all existing program approval and examination safeguards while removing an arbitrary time-based restriction that has not been shown to improve outcomes. For these reasons, I respectfully support adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Cliff Moore".

Cliff Moore
Department Chair
EMS Program Coordinator
Hutchinson Community College
3211 E. 4th Ave
Hutchinson, KS 67501

From: [Vosburg, Kent](#)
To: [Joseph House \[BEMS\]](#)
Cc: Chris.Cannon@cowley.edu
Subject: Support for Proposed Change to K.A.R. 109-11-8
Date: Thursday, January 29, 2026 10:11:59 AM

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Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification. The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity.

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Thank you for your consideration.

Sincerely,

Kent W. Vosburg, Paramedic, NRP
EMS Chief
kent.vosburg@junctioncity-ks.gov

Junction City Fire Department
700 N Jefferson
Junction City, KS 66441
[785-238-6822](tel:785-238-6822) Office ext 440
[785-209-0255](tel:785-209-0255) Cell

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From: [Brian Huntzinger](#)
To: [Joseph House \[BEMS\]](#)
Cc: [Cannon, Chris](#)
Subject: Re: KAR 109-11-8 Support
Date: Thursday, January 29, 2026 12:03:45 PM

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Re: Support for Proposed Change to K.A.R. 109-11-8

Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity.

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The proposed change preserves all existing program approval and examination safeguards while removing an arbitrary time-based restriction that has not been shown to improve outcomes. For these reasons, I respectfully support adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your consideration.

Sincerely,

Brian Huntzinger, Education Program Manger
Pottawatomie County EMS

From: Cannon, Chris <chris.cannon@cowley.edu>
Sent: Wednesday, January 28, 2026 13:35
To: Cannon, Chris
Cc: Joseph House [BEMS]
Subject: EXTERNAL: KAR 109-11-8 Support

Hello,



Regional Office:
300 4th St.
PO Box 109
Holton, KS 66436
785-364-1911

Re: Support for Proposed Change to K.A.R. 109-11-8

Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity. Eliminating the waiting period improves efficiency, reduces unnecessary barriers, and allows students to test while knowledge remains fresh. It also supports workforce development by enabling newly trained EMS providers to credential and enter service more promptly, an important consideration given ongoing staffing challenges across Kansas.

The proposed change preserves all existing program approval and examination safeguards while removing an arbitrary time-based restriction that has not been shown to improve outcomes. For these reasons, I respectfully support adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your consideration.

Sincerely,

Donna Connell
Education Director
TECHS, Inc,
Jackson County EMS
Nemaha County EMS
Osage County EMS
Doniphan County EMS
300 W 4th St
Holton, Kansas 66436
785-305-0873

From: [Paul Misasi](#)
To: [Joseph House \[BEMS\]](#)
Subject: Support for Proposed Change to K.A.R. 109-11-8
Date: Monday, February 2, 2026 9:38:08 AM
Attachments: [image001.png](#)

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Dear Executive Director House,

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity.

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The proposed change preserves all existing program approval and examination safeguards while removing an arbitrary time-based restriction that has not been shown to improve outcomes. For these reasons, I respectfully support adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your consideration.
Sincerely,

Paul Misasi, PhD, MS
Assistant Professor, Clinical Faculty
Track Director, Health Systems Science

m. 316.680.3819, office #414
217 E. Douglas Ave., Wichita, KS 67202
www.kansascom.org

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From: [Compassion Matters](#)
To: [Joseph House \[BEMS\]](#)
Subject: Re: KAR 109-11-8 Support
Date: Thursday, January 29, 2026 12:17:53 AM

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Re: Support for Proposed Change to K.A.R. 109-11-8

Dear Executive Director House,

Hello. I want to write in support of this proposed change. I have had several students call and request to be in the test site just a few hours after the 7 day requirement deadline,. It is difficult to turn them down. I believe this would open up more opportunities for the students who have worked so hard to become EMTs. Thank you, Julie Talbert

I am writing in support of the Kansas Board of Emergency Medical Services' proposed change to K.A.R. 109-11-8 eliminating the seven-day notification requirement of course completion prior to an EMS student challenging the cognitive examination for certification.

The current waiting period does not provide a clear educational, clinical, or administrative benefit. EMS education programs already verify student competency and readiness for examination prior to authorizing testing. Requiring an additional, fixed delay does not enhance patient safety or examination integrity.

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The proposed change preserves all existing program approval and examination safeguards while removing an arbitrary time-based restriction that has not been shown to improve outcomes. For these reasons, I respectfully support adoption of the proposed change to K.A.R. 109-11-8.

Thank you for your consideration.

Sincerely, Julie Talbert

On Wed, Jan 28, 2026 at 11:50 PM Cannon, Chris <chris.cannon@cowley.edu> wrote:

Thank you!

Chris Cannon
Cowley College
EMS Education



**Emergency Medical Services
Education & Training**

<http://www.cowley.edu/paramedic>

1406 East Eighth

Winfield, Kansas 67156

620.229.5985

chris.cannon@cowley.edu

December 1, 2025

Joseph House, Executive Director
Kansas Board of EMS
Landon State Office Building
900 SW Jackson Street, Room 1031
Topeka, KS 66612-1228

Re: K.A.R. 109-11-8 Proposed Change Public Comment

Dear Executive Director House,

Cowley College fully supports the proposed change to K.A.R. 109-11-8, as published in the November 27, 2025 issue of the Kansas Register (Doc. No. 053679), eliminating the seven-day requirement for notification of successful course completion prior to challenging the state's cognitive knowledge examination.

The proposed change is beneficial for all sponsoring organizations engaged in initial EMS education classes, and will remove an unnecessary administrative oversight burden without compromising student outcomes. Removing the requirement will streamline the end-of-program and certification processes with no negative impacts.

Timely testing reduces lag time between course completion and certification, which is particularly important in areas of Kansas experiencing EMS staffing shortages. This change would help ensure newly trained providers can enter the workforce more rapidly, which is especially beneficial for rural areas and underserved communities in Kansas.

In summary, Cowley College fully supports the proposed change to K.A.R. 109-11-8 and we are glad to provide this letter and in-person testimony to support this change.

Please contact me with any questions.

Regards,

A handwritten signature in black ink, appearing to read "Chris Cannon", written over a horizontal line.

Chris Cannon
EMS Program Director
Cowley College



**Emergency Medical Services
Education & Training**

3821 E Harry
Wichita, Ks 67218
Mgraham7@wsutech.edu

Feb 2, 2026

Joseph House, Executive Director
Kansas Board of EMS
Landon State Office Building
900 SW Jackson Street, Room 1031
Topeka, KS 66612-1228

Re: Proposed changes to K.A.R. 109-17-1 and BLS Exam Required Equipment

Dear Executive Director House,

Thank you for the opportunity to provide feedback regarding the proposed regulatory changes and updates to the BLS psychomotor examination required equipment list.

While we support ongoing evaluation of EMS education standards and appreciate efforts to ensure examinations remain defensible and aligned with current practice, we respectfully oppose the proposed expansion of required equipment for the BLS psychomotor exam.

Although our institution does not operate a paramedic program, we do provide EMT, and these proposed changes would directly impact our students, faculty, and examination operations. The addition of equipment such as scoop stretchers and other items represents a significant financial and logistical burden for exam sites without clear evidence that these additions improve the validity, reliability, or educational value of the BLS psychomotor examination.

From an educational standpoint, expanding the required equipment list does not inherently enhance assessment of entry-level competency or clinical judgment. Instead, it risks reinforcing outdated or inconsistent practices that do not align with current evidence-based spinal motion restriction guidance. As noted in prior Medical Advisory Council guidance, rigid immobilization devices are increasingly viewed as extrication

tools rather than therapeutic interventions, and their inclusion as required test components may conflict with modern standards of care.

The financial impact of these changes is also a significant concern. Many EMS education programs particularly those serving rural or volunteer-based communities operate with limited budgets. Requiring additional equipment across multiple exam stations creates inequitable financial strain and may ultimately limit access to testing opportunities without a demonstrated educational benefit.

Additionally rather than expanding mandatory equipment requirements, we encourage the Education, Examination, Training, and Certification Committee to consider alternative approaches that more accurately assess competency. Specifically, we support exploring a student minimum competency portfolio model for EMT education, similar to what is currently utilized at the AEMT level. This model allows for longitudinal assessment of clinical judgment, patient assessment, and skill performance across the duration of the program rather than relying on a single, high-stakes practical exam.

In summary, while we support continuous improvement of EMS education and assessment, we respectfully oppose the proposed expansion of BLS psychomotor exam equipment requirements and encourage the Board to consider evidence-based, cost-conscious alternatives that better reflect modern EMS practice and educational outcomes.

Thank you for your time, leadership, and consideration of the perspectives of EMS educators across Kansas. Please feel free to contact me if additional discussion or clarification would be helpful.

Respectfully,

Meghan Graham, EMT/P
WSU Tech
EMS Education Program Director



**Emergency Medical Services
Education & Training**

<http://www.cowley.edu/paramedic>

1406 East Eighth

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chris.cannon@cowley.edu

January 30, 2026

Joseph House, Executive Director
Kansas Board of EMS
Landon State Office Building
900 SW Jackson Street, Room 1031
Topeka, KS 66612-1228

Re: Proposed Changes to K.A.R. 109-17-1 and BLS Exam Required Equipment

Dear Executive Director House,

Cowley College fully supports the proposed change to K.A.R. 109-17-1 that would align this regulation with the updated KSA 65-6129a. This change will be especially beneficial for paramedic programs by allowing their students to be supervised by clinical paramedics.

Cowley College opposes the proposed expansion of the mandatory equipment list for the BLS Exam. This proposed change will increase costs for exam providers without providing a clear benefit to the validity or reliability of the exam, or enhancing its ability to assess clinical judgment or entry-level competence.

Instead of adopting more required equipment, we instead encourage the EETC to follow the MAC guidance document from 2013 regarding spinal motion restriction and remove long spine boards from the BLS exam required equipment list. We also encourage the EETC to begin exploring the implementation of a student minimum competency portfolio, similar to what is successfully used in AEMT and Paramedic programs, for the EMR and EMT levels.

In summary, Cowley College fully supports the proposed change to K.A.R. 109-17-1 to align it to statute, and opposes the expansion of the BLS exam required equipment list. We also encourage the removal of the long spine board from the BLS exam until a student portfolio system can be adopted to replace the BLS exam.

Please contact me with any questions.

Regards,

A handwritten signature in black ink, appearing to read "Chris Cannon", written over a horizontal line.

Chris Cannon
EMS Program Director
Cowley College



Kansas EMS Association Educator's Society

January 29, 2026

Education, Examination, Training and Certification Committee
Kansas Board of EMS
900 SW Jackson
Topeka, KS 66612

Reference: BLS Exam Expanded Required Equipment

Dear Committee Members,

The KEMSA Educator's Society represents several sponsoring organizations and EMS educators throughout the state of Kansas and provides a voice for them when the need arises. We appreciate the opportunity to provide input regarding the proposed addition of scoop stretchers and cold packs as required equipment for the BLS practical examination. After careful consideration, we respectfully oppose this change for several reasons, chiefly those related to clinical relevance and increased financial burden for exam providers. We also propose that the long spine board be removed from the required equipment list, and the EETC begins exploring the adoption of a student minimum competency (SMC) portfolio for EMR and EMT programs, similar to what is now successfully used at the AEMT and Paramedic levels.

Requiring the use of scoop stretchers as part of EMT psychomotor testing is inconsistent with current evidence-based practice regarding spinal motion restriction. The Kansas Board of EMS Medical Advisory Council has clearly stated that traditional spinal immobilization techniques using rigid devices have no demonstrated patient benefit and that long backboards and similar devices should be considered extrication tools rather than therapeutic interventions, with documented potential for patient harm (*MAC PS 2013-003*). While scoop stretchers are sometimes used operationally to facilitate patient movement, their inclusion as a tested competency implies clinical value that is not supported by available evidence, does not align with modern spinal motion restriction principles, and contradicts MAC guidance. Incorporating scoop stretchers into EMT testing risks reinforcing outdated practices and further reducing the validity of the BLS practical examination.

The financial impact of adding required equipment should not be underestimated. While programs may have one scoop stretcher in their inventory, having enough to supply a multiple station exam site is an exception. Many EMS education programs operate with limited budgets, particularly smaller, rural, or volunteer programs. Mandating additional equipment such as additional scoop stretchers introduces a non-trivial cost that may not be equitably borne across programs, creating unnecessary barriers without a clearly demonstrated benefit to entry-level competency assessment. In speaking about this proposed change with four program directors, three noted that they would need to immediately purchase additional scoop stretchers to comply with this change. One program director estimated they would need to spend over \$5,000 to equip their exam stations with scoop stretchers.

**continued on page 2*

"Providing resources for EMS educators and advocating for all EMS providers throughout Kansas in the realm of education"

Chair: Chris Cannon, MS, Paramedic



Kansas EMS Association Educator's Society

**continued from page 1*

With a proposed implementation of May 1, 2026 after first being brought forward in February, this proposal does not provide adequate time for organizations to budget and procure these additional items before the change goes into effect. We encourage board members to have a dialogue with EMS educators and those directly involved in the BLS exam process prior to making any significant change, and allow a broad variety of voices to be heard.

There is no demonstrated evidence that the inclusion of scoop stretchers or cold packs would improve the validity or reliability of the current BLS practical examination. Adding equipment alone does not inherently enhance an exam's ability to measure entry-level competence. Without data showing improved discrimination, consistency, or alignment with the Kansas or National EMS Education Standards, this change increases exam complexity without improving its psychometric quality. Additionally, expanding required equipment increases logistical complexity for exam sites and proctors, introducing variability in equipment familiarity, setup, and evaluation.

Cold packs raise similar concerns to scoop stretchers. While commonly used in the field, their inclusion as required equipment does not meaningfully test higher-order clinical judgment or psychomotor competence. Their assessment value is marginal when weighed against the increased cost they introduce.

Rather than expanding mandatory equipment lists, we encourage the EETC Committee to:

1. Follow the MAC guidance from 2013, as well as current national treatment recommendations, and eliminate the long spine board from the BLS exam required equipment list.
2. Begin the adoption of a student minimum competency (SMC) portfolio model for the BLS practical examination.

An SMC approach would allow candidates to demonstrate sound clinical judgment, patient assessment, and appropriate intervention selection throughout their time in the educational program, as opposed to a one-time performance snapshot at a BLS exam. This approach aligns with what is being used successfully at the AEMT and Paramedic levels.

Thank you for your continued work to make Kansas EMS examinations fair, defensible, and educationally sound. We respectfully urge the Committee to reconsider the proposed equipment additions and instead pursue assessment models that emphasize clinical reasoning and competency measured over an extended timeframe rather than a one time, single and limited evaluation of practical skills.

Respectfully on behalf of Kansas EMS Educators,

Chris Cannon
Educator's Society Chair

"Providing resources for EMS educators and advocating for all EMS providers throughout Kansas in the realm of education"

Chair: Chris Cannon, MS, Paramedic



Evan Seiwert
Department Chair
Fire & EMS Education

January 27, 2026

Director House,

I am writing to offer comment upon the EETC agenda for February 5, 2026. Under new business there is an item to consider a request to change the BLS Skills Exam Mandatory Equipment to include a scoop stretcher.

I am writing on behalf of Butler Community College to oppose the addition of a scoop stretcher to the mandatory equipment list. In our education program students receive education and experience on multiple lifting and moving devices as required by the Kansas EMS Education Standards, including the scoop stretcher.

However, our organization does not currently own a sufficient quantity of scoop stretchers to support their inclusion in all exam rooms at a psychomotor exam site. Purchasing these devices solely for use at an exam site presents a significant financial investment. These devices are also not heavily utilized by EMS agencies in south-central Kansas, so it is my belief that limited education funds can be better invested in other equipment that will provide higher dividends for student education.

In view of this, I would urge the EETC to abstain from adding the scoop stretcher to the required exam equipment.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Evan Seiwert".

Evan Seiwert
Chair, Fire & EMS Education
Butler Community College

Full Board