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From: Danny R. Donegan, Jr. [mailto:danny.r.donegan@gmail.com]
Sent: Saturday, December 10, 2011 10:58 PM
To: Schmider, Joseph
Subject: PA EMS Rules

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Joseph,

I realize the deadline for comments was 29 November 2011 but I was out at sea for the month of November and since I feel strongly I decided to send a comment in anyway.

Act 37 states:

§ 8124. Emergency medical services instructors.

(3) Has successfully completed an EMS instructor's course approved by the department, or possesses a bachelor's degree in education, a teacher's certification in education or a doctorate or master's degree.

However, the administrative rules were changed in intent to read:

§ 1023.51. Certified EMS instructors

(3) Has successfully completed an EMS instructor course approved by the Department or possesses, at a minimum, a bachelor's degree in education or a teacher's certification in education.

I realize that people like Donna in Philadelphia are adamant in a curriculum in education but colleges do not require someone with a doctorate in Economics to go back to school and also receive a doctorate in Education before they may bestow knowledge upon future students. In fact, grammatically the law would be interpreted as a bachelor's degree in education, a bachelor's degree in any field with a teaching certificate, or any masters or any doctorate. It concerns me that members of the EMS Councils see fit to impose their own interpretations upon legal writings that are really very clear to those who have studied English and do not have our own personal misconceptions about our level of authority. Act 37 is written fairly plainly in many sections and this one would appear to one of them. A person with a masters degree and extensive teaching experience would make a much better instructor than a person with no degree, no experience, and completion of a 20 hour instructor course. I'd like to see Pennsylvania stick to the letter of the law when writing their administrative rules to enforce the law – instead of attempting to promulgate new laws to suit their own opinions and change the law that was written after the fact.

Thanks for time,

Danny

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Danny's Online Calendar

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