

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: May 5, 2022

FROM: Michael A. Morrell
Acting Administrative Rules Director

AT (OFFICE): Legislative Services

SUBJECT: Proposed Interim Rule INT 2022-4 EMS Letters of Concern Rules

Attached are Christina Muñiz's comments on Proposed Interim Rule INT 2022-4 from the Department of Safety (Department) relative to the adoption and readoption with amendment of Saf-C 5901-571, Saf-C 5922-02, Saf-C 5922-04, and Saf-C 5922-11 on EMS letters of concern rules. The Proposed Interim Rule implements Chapter 205 of the Laws of 2021, codified as RSA 153-A:13. The amendments to the statutes were effective October 9, 2021. Please note that, if approved by JLCAR, the Board may adopt the rule, but it would be effective for only 180 days during which time the Department would undertake regular rulemaking.

INT 2022-4 has been filed pursuant to RSA 541-A:19, I(a), which authorizes interim rules that are designed solely to conform with a new or amended codified state statute or chaptered session law.

The substantive comments are on page 4 and relate to the public interest due to lack of clarity and legislative intent due to the possibility of oral rulemaking in violation of RSA 541-A:22, I the proposed rule allows for a deferred or rescinded suspension without clear criteria for how these would be applied to the regulated community.