



Sarah Huckabee Sanders
GOVERNOR

Renee Mallory, RN, BSN
SECRETARY OF HEALTH

Jennifer Dillaha, MD
DIRECTOR

September 30, 2025

Senator Tyler Dees, Co-Chair
Representative Matthew Shepard, Co-Chair
Administrative Rules Subcommittee
Arkansas Legislative Council
Via Rebecca Miller-Rice Email Miller-Ricer@blar.arkansas.gov

RE: Request to Exclude Act 1021 of 2025 from mandatory reporting requirements

Dear Co-Chairs,

Pursuant to Ark. Code Ann § 25-15-216(c), the Arkansas Board of Health, through the Department of Health (Department), respectfully requests an exception from the requirement to promulgate rules pursuant to Ark. Code Ann. § 20-13-1905, created by Act 1021 of 2025. The Department understands and appreciates the importance of transparency and consistency in the rulemaking process and believes that a rule is not necessary for the operation of the newly enacted law. The Department requests that the rule be excluded from the requirements of § 25-15-216(b)(3)-(5) for the following reasons:

1. Existing Statutory Authority

The existing statutory authority established by Act 1021 creates a fund to support emergency medical services. The Arkansas Revenue Investment in Vital EMS Systems Act outlines eligibility requirements, application procedures, and disbursement standards. It also requires the Board of Health to promulgate rules in accordance with these standards. However, the existing statutory authority already adequately addresses the eligibility and disbursement standards. Therefore, after thoughtful consideration, the Department does not believe additional rules are necessary for implementation of this Act and the ARRIVES Fund.

2. The Required Rule would Merely Restate the Newly Enacted Law

If the Board of Health were to promulgate rules based on Act 1021, those rules would merely restate the provisions of the newly enacted law, which already clearly set out the eligibility requirements, application procedures, and disbursements standards. Therefore, the Department does not believe additional rules are necessary to implement this Act.

Arkansas Department of Health
4815 West Markham St. · Little Rock, AR 72205

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The Department's staff discussed its position with the primary sponsor of the Act and the industry, and they concur with its determination. Therefore, the Department respectfully requests that this Act be excluded from mandatory reporting requirements. Please let me know if you have questions or need additional information.

Sincerely,



Laura K. Shue
Chief Legal Counsel
Arkansas Department of Health
4815 West Markham Street
Little Rock, AR 72205-3867
Office (501) 661-2297
Cell (501) 580-3493
Laura.Shue@arkansas.gov

Cc: Rebecca Miller-Rice, Administrator, Administrative Rules Review Section, BLR
Renee Mallory, Secretary of Health, ADH
Don Adams, Chief of Staff, ADH
Jennifer Dillaha, Director, Department of Health
Cortney Kennedy, Chief Legal Counsel, Governor's Office
Josh Stewart, Policy Advisor, Governor's Office