

West Virginia Racing Commission

Public Comment and Response

Re: proposed amendments to 178 CSR 1, Thoroughbred Racing Rules

July 2025

The Commission received only one public comment on the proposed Rule. The following comment was received via email from Donovan King:

From: **Donavan King** <donavanaking@gmail.com>

Date: Sat, Jul 19, 2025 at 8:55 PM

Subject: Request for Amendment to 178 CSR 1 §22.1.b – EMS Staffing at Races

To: <joe.k.moore@wv.gov>

Dear Mr. Moore,

My name is Donovan Alexander King, and I am a Nationally Registered Paramedic (NRP) licensed in West Virginia. I currently work trackside at Hollywood Casino at Charles Town Races.

I am writing to respectfully request a revision to 178 CSR 1 §22.1.b, which currently reads:

“The association shall furnish and maintain at least one (1) ambulance for the exclusive use of persons, staffed with at least two (2) emergency medical technicians, one of whom shall be a certified paramedic.”

This language excludes Advanced EMTs, despite their being licensed to provide advanced life support within their scope of practice. I propose updating the rule to read:

“The association shall furnish and maintain at least one (1) ambulance for the exclusive use of persons, staffed with at least two (2) emergency medical services personnel, one of whom shall be a certified paramedic. The second provider may be a certified Emergency Medical Technician or Advanced Emergency Medical Technician.”

This change would retain the requirement for a Paramedic, while allowing the second provider to be an AEMT who can perform and be compensated for advanced-level skills within their certification scope, improving staffing flexibility and recognizing the full capabilities of AEMTs.

I appreciate your consideration of this amendment and welcome the opportunity to provide further input if needed.

Sincerely,
Donavan Alexander King, NRP
(304) 886-7639
donavanaking@gmail.com

The Commission's Response:

This suggested change to the Rule is not one that the Commission contemplated, nor has the industry had an opportunity to consider it. The Commission would require additional time to consider its impact on both the racing participants and racetracks. Accordingly, the Commission has elected not to incorporate the suggested change into the Rule at the present time.