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Executive Office of Health and Human Services
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TO: All MA Licensed Ambulance Services
CC: EMCAB Members

FROM: Deborah Allwes, BS, BSN, MPH, Director
Bureau of Health Care Safety and Quality

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DATE: August 7, 2014

RE: Student Field Internships at MA-Licensed Ambulance Services Limited to Students in Department-Accredited EMT Training Institutions

It has come to our attention at the Massachusetts Department of Public Health's (Department) Office of Emergency Medical Services (OEMS) that Massachusetts ambulance services may be permitting out-of-state students who are not enrolled in Department-approved EMT training programs at Department-accredited training institutions to function as EMTs at the level at which they are training. This is a violation of the EMS System regulations.

Please be advised that under M.G.L. c. 111C, §§9 and 19(a)(3), and under 105 CMR 170.790(C) and 170.900 of the EMS System regulations, no person can work as an EMT without being currently certified as an EMT. The only exception to this is if the person is functioning as a student EMT in accordance with 105 CMR 170.850. Under the latter provision, a person duly enrolled in a Department-approved EMT training program (which can only be provided by Department-accredited training institutions, in accordance with 105 CMR 170.945) may function as an EMT at the level at which he or she is being trained, under restrictions set out in this regulation. One of these restrictions is that, under 105 CMR 170.850(A), "Any and all patient contact by the student is directly supervised and evaluated by an on-site health care professional authorized to do so by the Department-accredited training institution offering the initial training program." Therefore, a student who is not duly enrolled in a Department-approved EMT training program, is not authorized to function as a student paramedic in a field internship at a MA licensed ambulance service.

If you have any questions, please contact Aaron Gettinger, NREMT, I/C, EMS Education and Training Coordinator, at aaron.gettinger@state.ma.us.