

DEPARTMENT OF HEALTH SERVICES

**PUBLIC HEALTH SERVICES
BUREAU OF EMERGENCY MEDICAL SERVICES
#SP-082-PHS-EMS**

**PUBLIC HEALTH LICENSING SERVICES
BUREAU OF MEDICAL FACILITIES LICENSING
#SP-034-PHL-MED**

EMERGENCY MEDICAL CARE TECHNICIANS PRACTICING IN HOSPITALS

This substantive policy statement is advisory only. A substantive policy statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules made in accordance with the Arizona Administrative Procedure Act. If you believe that this substantive policy statement does impose additional requirements or penalties on regulated parties, you may petition the agency under Arizona Revised Statutes Section 41-1033 for a review of the statement.

The purpose of this substantive policy statement is to notify the public of the policy of the Arizona Department of Health Services (Department) regarding emergency medical care technicians (EMCTs) practicing in hospitals¹.

The Department believes that it is permissible for an EMCT, as defined in Arizona Revised Statutes (A.R.S.) § 36-2201 and Arizona Administrative Code (A.A.C.) R9-25-101, to work as an EMCT in the hospital environment, provided that the EMCT and the hospital's administrator and governing authority comply with all of the applicable statutes and rules.

The Department certifies EMCTs and regulates their practice under A.R.S. Title 36, Chapter 21.1 and the rules in 9 A.A.C. 25, Articles 2, 4, and 5. The Department licenses and regulates hospitals under A.R.S. Title 36, Chapter 4 and the rules in 9 A.A.C. 10, Articles 1 and 2.

The Department is aware that a number of hospitals currently hire or contract with EMCTs to provide patient care services in the hospital environment. The Department has been informed that this currently occurs under either of two scenarios:

1. An EMCT is hired or contracted to act as an EMCT and has a job title that includes "Emergency Medical Care Technician," "EMCT," "Paramedic," or one of the other classifications of EMCT; or
2. An EMCT is hired or contracted to act in a non-EMCT capacity and has a job title such as "Emergency Technician," "Medical Technician," or "Patient Care Technician."

EMCT hired or contracted to act as an EMCT

An EMCT who is hired or contracted to act as an EMCT in a hospital is required to comply with the rules for EMCT certification and practice found in 9 A.A.C. 25, Articles 2, 4, and 5. This means that the EMCT must be certified by the Department at a specific level of EMCT and comply with requirements in A.A.C. R9-25-502(A). The EMCT may only perform those medical treatments, procedures, or

¹ "Hospital" means a health care institution that is licensed by the Department, under 9 A.A.C. 10, Article 2, as a general hospital, rural general hospital, or special hospital that provides emergency services or that is a general hospital operated by the federal government or a sovereign tribal nation.

techniques within the EMCT's scope of practice as specified in Table 5.1 and may administer, monitor, and assist in patient self-administration of only those agents² that are authorized for the EMCT's use by the EMCT's administrative medical director and either specified in Table 1 (EMCT Drug Box) or Table 3B (Agents Eligible for Administration and Monitoring in a Hospital Setting) of Table 3 (Special Agents Eligible for Administration and Monitoring). See <https://www.azdhs.gov/preparedness/emergency-medical-services-trauma-system/index.php#chapter-25>. The EMCT must:

1. If performing an ALS skill, as defined in A.A.C. R9-25-501:
 - a. Be authorized by the EMCT's administrative medical director to perform the ALS skill; and
 - b. Have the ability to receive on-line medical direction, as defined in A.R.S. § 36-2201; and
2. If performing an STR skill, as defined in A.A.C. R9-25-101:
 - a. Have documentation of having completed training specific to the STR skill that is consistent with the knowledge, skills, and competencies established according to A.R.S. § 36-2204;
 - b. Be authorized by the EMCT's administrative medical director to perform the STR skill; and
 - c. Have the ability to receive on-line medical direction, as defined in A.R.S. § 36-2201.

A hospital's administrator and governing authority must require that the hospital's use of EMCTs complies with the hospital licensing requirements in A.R.S. Title 36, Chapter 4 and 9 A.A.C. 10, Articles 1 and 2 and ensure that the hospital meets the definition of emergency medical services provider in A.R.S. § 36-2201 and complies with the responsibilities of an emergency medical services provider in 9 A.A.C. 25, Article 2.

A.A.C. R9-25-201 requires an emergency medical services provider to:

1. Designate a physician with specific qualifications as administrative medical director and notify the Department of changes to its administrative medical director;
2. Ensure that required protocols and policies and procedures are established, documented, and implemented;
3. Ensure that an EMCT acting as an EMCT for the emergency medical services provider receives administrative medical direction; and
4. Ensure that requirements related to the agents to which the EMCT has access are followed.

A.A.C. R9-25-202 requires an emergency medical services provider to ensure that:

1. A physician with specific qualifications provides on-line medical direction to EMCTs acting on behalf of the emergency medical services provider;
2. A physician with the specific qualifications is available to provide on-line medical direction to an EMCT 24 hours a day, seven days a week;
3. On-line medical direction provided to EMCTs acting on behalf of the emergency medical services provider is consistent with the EMCT's scope of practice and protocols established by the EMCT's administrative medical director; and
4. Communication equipment that will allow on-line medical direction to be given to an EMCT is operational and accessible, and a plan for alternative communications in the event of a disaster has been established and documented.

² "Agent" means a chemical or biological substance that is administered to a patient to treat or prevent a medical condition. "Administer" or "administration" means to directly apply or the direct application of an agent to the body of a patient by injection, inhalation, ingestion, or any other means and includes adjusting the administration rate of an agent.

A hospital may choose to satisfy the requirements for on-line medical direction by having numerous physicians with the specific qualifications in A.A.C. R9-25-202 available, either in person and through communications equipment, to provide on-line medical direction to the EMCTs working in the hospital. The administrator and governing authority for a hospital that hires or contracts with EMCTs to act as EMCTs in the hospital must require that the hospital's medical staff bylaws, as defined in A.A.C. R9-10-101, and medical staff regulations in A.A.C. R9-10-207 address the requirements for administrative medical direction and on-line medical direction for EMCTs acting as EMCTs in the hospital. In addition, the administrator and governing authority must comply with all hospital licensing rule requirements related to an EMCT's status as a personnel member, as defined in A.A.C. R9-10-101, providing physical health services.

EMCT hired or contracted to act in a non-EMCT capacity

The Department has been informed by the Arizona Medical Board, Arizona Board of Osteopathic Examiners in Medicine and Surgery, and Arizona Board of Nursing that the permissible scope of practice for an individual who is an EMCT but who works in a hospital in a non-EMCT capacity is extremely limited. Such an individual is considered to be an unlicensed person. According to the Arizona Medical Board and Arizona Board of Osteopathic Examiners in Medicine and Surgery, physicians are prohibited from supervising or delegating medical tasks to unlicensed persons other than qualified medical assistants.

Thus, such persons can only perform:

- Non-medical tasks; and
- Those tasks that can be legally delegated to unlicensed persons by a nurse according to the statutes, rules, and advisory opinions of the Arizona Board of Nursing.

For information on what tasks may permissibly be performed by an unlicensed person, please contact the Arizona Medical Board, Arizona Board of Osteopathic Examiners in Medicine and Surgery, and Arizona Board of Nursing.

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