



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
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Bureau of Health Care Safety and Quality
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ADVISORY 20-02-01

TO: All MA Licensed Ambulance Services
CC: EMCAB Members
FROM: Elizabeth Kelley, Director, Bureau of Health Care Safety and Quality
DATE: February 18, 2020
RE: Physician Signatures on EMS Patient Care Reports Documenting On-Line Medical Direction Orders

The purpose of this Advisory is to update and clarify for ambulance services and their EMS personnel the requirement for when physician signatures are required on EMS patient care reports (PCRs). This Advisory supersedes Advisory 16-10-01, which has been rescinded.

Based on changes to the federal Controlled Substances Act, 21 U.S.C. § 823(j)(4), which now expressly recognizes EMS Statewide Treatment Protocols (STPs) adopted by a state authority as a standing order by a medical director, there is no requirement for a physician signature on a PCR when the only medications EMS personnel administered to the patient were in accord with STP standing orders. The Department's Drug Control Program does not require an authorized prescriber's signature in these circumstances.

Under 105 CMR 170.300(A)(8) of the EMS System regulations, a signature by a physician or their designee is only required on a PCR when EMS personnel administer a medication or treatment to a patient for which the STP requires, and the EMS personnel obtain, on-line medical director orders. The purpose of this regulation is to memorialize the order given by the physician, and not to prescribe the medication. A designee who signs on behalf of the physician need not be a prescriber, but must be an appropriately licensed or certified health care provider working for the hospital (i.e., registered nurse, nurse practitioner, physician assistant or paramedic EMS coordinator).

For further questions, please contact the Department's EMS Medical Director, Dr. Jon Burstein, at jon.burstein@mass.gov.