

FREQUENTLY ASKED QUESTIONS
ADVISORY 25-11-01

TO: Massachusetts Certified EMTs and Paramedics (EMS Personnel)
Massachusetts Licensed Ambulance Services
FROM: Susan Lewis, NRP, Director
DATE: November 28, 2025
RE: Limits on EMS Personnel Functioning as EMTs and Paramedics—Frequently Asked Questions (FAQs)

The purpose of this document is to address frequently asked questions regarding the Department of Public Health's (Department) [Advisory 25-11-01](#), dated November 18, 2025. The advisory reminded EMS personnel that they may only function as EMTs or paramedics when they are on duty for a licensed ambulance service, licensed EMS First Responder (EFR) service (at the BLS level or above only), or a Department-approved mobile integrated health (MIH) or community EMS (CEMS) program.

1. *What is the basis for this advisory? Where did this rule come from?*

This advisory is based upon Massachusetts law regarding the use of emergency medical services titles, provision of services, and related prohibitions, [M.G.L. c. 111C, § 19\(a\)](#), which states:

No person shall... provide EMS or hold oneself out as, or use the title of EMS first responder, emergency medical technician, or paramedic or the acronym EMT or any other title or acronym used by the department in the certification of emergency medical services personnel... other than on behalf of an EMS first response service or an ambulance service or other EMS provider duly licensed...

Essentially, the law provides that your EMT or paramedic credentials are only valid when you are working for a licensed ambulance service, licensed EFR service, or Department-approved MIH or CEMS program.

2. *When was this statute enacted?*

March 30, 2000.

3. *Why did the Department send me this advisory?*

The Department sent this advisory to all EMTs and paramedics to avoid and prevent potential compliance issues. Pursuant to [the law](#), violations may be punished by fines and the Department may report offenses to the Attorney General's Office. In addition, non-compliance could result in action against your EMT or paramedic credentials.

4. *What does it mean to "hold myself out" as an EMT or paramedic?*

"Holding yourself out" as an EMT or paramedic means to represent yourself as having those credentials, certifications, or titles and as having the authority, status, or abilities of an EMT or paramedic at the scene of an emergency or in any work environment. This can

be done by using the title “EMT” or “paramedic” or by offering advice, skills, or services that only an EMT or paramedic may provide.

5. *What does it mean to be working “on behalf of an EMS first response service or an ambulance service or other EMS provider duly licensed”?*

This means that you are employed by, and on duty with, the licensed EMS provider, which is an ambulance service, EFR service, MIH or CEMS program.

6. *Why can’t an EMT or paramedic work in a hospital or clinic setting, if they are supervised and monitored appropriately?*

An EMT or paramedic cannot work in that capacity in a hospital because it is prohibited by [M.G.L. c. 111C, § 19\(a\)](#). A person may not hold themselves out as an EMT or paramedic unless they are employed by, and on duty with, a licensed ambulance service, EFR service, MIH or CEMS program. However, an individual who is certified as an EMT or paramedic may work in a hospital, or any other setting, in a position that does not require performing the functions of an EMT or paramedic.

7. *What about urgent care centers, dentists’ offices, or other clinics?*

The law applies to these facilities in the same manner described for hospitals or clinics above. A person may not hold themselves out as an EMT or paramedic unless they are employed by, and on duty with, a licensed ambulance service, EFR, MIH, or CEMS program.

8. *Does this mean that an EMT or paramedic can never accept a job in a setting other than an ambulance service, EFR, MIH, or CEMS?*

No, a person holding certification as an EMT or paramedic may work in other jobs or settings, but when doing so, they cannot hold themselves out as EMTs or paramedics and perform the skills and functions of an EMT or paramedic.

9. *What do I do if I am currently working in a hospital, urgent care, clinic, or other setting as an EMT or paramedic?*

First, speak with your employer about the requirements of this law and ask your employer to review your title and job description. If you believe that your employer is asking you to do something that would violate the law, you may file a complaint with the Department, which may be anonymous.

10. *Does this apply in military settings or on a military base?*

If the military organization is operating a licensed ambulance service under federal authority, then its employees may operate as EMTs or paramedics. However, if the military organization is not a federally licensed ambulance service, then its employees may only operate in Massachusetts at the first responder level.

11. *What about working as an EMT or paramedic at sporting events?*

EMTs and paramedics may work at sporting events if they are on duty with and deployed by a licensed ambulance service. The sponsor of the sporting event, e.g., the school, is

hiring the ambulance service to staff the sporting event with an EMT or paramedic. The sponsor/school cannot hire the EMT or paramedic directly or privately.

12. Does the ambulance service have to leave an ambulance at the sporting or other event the whole time?

No, the ambulance service may dispatch an on duty EMT or paramedic, with appropriate equipment to begin assessment at the side of a patient, without an ambulance. If emergency services are needed at the event, the EMT or paramedic would call for the ambulance to respond.

13. What about working in ski resorts or other first responder agencies that aren't licensed to run an ambulance or EFR service?

The law applies to these situations. A person may not hold themselves out as an EMT or paramedic unless they are employed by, and on duty with, a licensed ambulance or EFR service or Department-approved MIH or CEMS program.

14. What about working transporting organs?

A person may not hold themselves out as an EMT or paramedic unless they are employed by, and on duty with, a licensed ambulance or EFR service or Department-approved MIH or CEMS program. If the position for which the employee is transporting organs does not require certification as an EMT or paramedic, there is nothing in the statute prohibiting an EMT or paramedic from taking the position, as long as they do not perform duties and functions of an EMT or paramedic.

15. What if I am a police officer who holds a certification as an EMT or paramedic?

The law applies to this situation. A police officer who is working for a police department that is not licensed as an ambulance or EFR service may only operate at a first responder level.

16. What if I am volunteering as an EMT or paramedic at an event?

The law applies to this situation. A person may not hold themselves out as an EMT or paramedic, regardless of whether they are receiving compensation, unless they are on duty for a licensed ambulance or EFR service or Department-approved MIH or CEMS program. You may only operate at the first responder level.

17. What if I happen to observe an emergency? May I offer my assistance as an EMT or paramedic?

The law applies to this situation. A person may not hold themselves out as an EMT or paramedic, regardless of whether they are receiving compensation, unless they are on duty for a licensed ambulance or EFR service or Department-approved MIH or CEMS program. You may assist at the first responder level and should contact EMS as soon as practicable. However, pursuant to [M.G.L. c. 112, § 12V](#), “any person who, in good faith, attempts to render emergency care including, but not limited to, cardiopulmonary resuscitation or defibrillation, and does so without compensation, shall not be liable for acts or omissions, other than gross negligence or willful or wanton misconduct, resulting from the attempt to render such emergency care.” This statute only protects people acting

in their individual capacity from civil liability for negligence. EMTs and paramedics still must follow the requirements of M.G.L. c. 111C and [105 CMR 170.000](#) to remain in good standing for certification.

18. *What does it mean to be “on duty”? For example, if my ambulance service is contracted by a school system to staff interscholastic football games, and they send me on a scheduled day off and pay me overtime, can I work as an EMT or paramedic?*

On duty means that your ambulance service has deployed you to work as an EMT or paramedic on its behalf. Regardless of whether you were normally supposed to be off and are paid overtime to work this game, you are now on duty on behalf of the ambulance service and may work as an EMT or paramedic.

19. *What if I am off duty and the ambulance service where I work is responding to an emergency nearby, may I assist?*

No, because you are not on duty with the licensed ambulance service. However, your ambulance service may have a policy under which you could contact dispatch to be activated as on duty to assist if the dispatched crew on scene needs help.

20. *What happens if I violate this statute?*

If the Department becomes aware of a potential violation of M.G.L. c. 111C or [105 CMR 170.000](#), it is required to investigate and take appropriate action, including and up to revocation of an EMT or paramedic’s certification. [M.G.L. c. 111C, § 19\(b\)](#) includes possible referral for criminal action, including a penalty of not less than \$100 and not more than \$1,000 for each offense, where each day that violation continues is considered a separate offense. Therefore, a person or facility could be subject to fines of up to \$1000 a day. In addition, if an EMT or paramedic were providing services in violation of the statute, they would not be protected from personal liability under [M.G.L. c. 111C, § 21](#) and could be subject to a lawsuit for monetary damages.

21. *Why am I not covered by the “Good Samaritan Law”?*

Massachusetts does not have one “Good Samaritan Law” that covers all situations. Instead, there are a variety of laws that provide protection from civil or criminal liability for specific circumstances.¹ Most relevant here is [M.G.L. c. 112, § 12V](#), which states:

Any person who, in good faith, attempts to render emergency care including, but not limited to, cardiopulmonary resuscitation or defibrillation, and does so without compensation, shall not be liable for acts or omissions, other than gross negligence or willful or wanton misconduct, resulting from the attempt to render such emergency care.

Note that this statute only protects people who are acting without compensation, meaning that it does not apply when someone is working on duty for any entity as an EMT or paramedic. In addition, this statute only protects people acting in their individual capacity

¹ For example, [M.G.L. c. 258C, § 13](#) applies to assisting victims of crimes, [M.G.L. c. 94C, § 19B](#) applies to use of an opioid antagonist on someone experiencing an overdose, and [M.G.L. c. 94C, § 34A](#) applies to seeking medical attention for a drug-related overdose.

from civil liability for negligence. EMTs and paramedics still must follow the requirements of M.G.L. c. 111C and [105 CMR 170.000](#) to remain in good standing for certification.

22. *Will the Department issue me, or the facility employing me, a waiver?*

No, the Department is required to follow the law. The Department has no authority to waive a statute enacted by the Legislature. Only the Legislature can amend or change a statute.

23. *My question wasn't answered. Can the Department advise me on my particular situation or employment?*

As employees of the Commonwealth of Massachusetts, Department staff cannot give you legal advice, nor advise you on your particular factual situation. In addition, once the Department becomes aware of a potential violation of M.G.L. c. 111C or [105 CMR 170.000](#), it is required to investigate and take appropriate action.