

OEMS Regulatory Guidance Document for EMS Providers Functioning as Hospital Employees

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Hospitals and other health care facilities have employed providers with emergency medical services (EMS) certifications in various capacities for many years. EMS providers can contribute their clinical skills and experience in a variety of clinical settings such as the Emergency Department (ED).

When EMS providers function as hospital employees only and are not providing care as an affiliated member of a licensed EMS agency, the EMS regulations do not apply to their practice in that capacity. An example could be a technician who is required to have a current EMT certification as a requirement for employment as a patient care technician working in a hospital Emergency Department.

It is generally recommended that the employer should be familiar with the scope of practice described by the Office of EMS for a given level of EMS certification; however, the employer may determine the scope of practice for that provider. For example, an ED technician with EMT certification may be authorized by the facility to perform phlebotomy and place IV catheters, a skill that would not be within the scope of practice for an EMT practicing with a licensed EMS agency.

If an employed provider is an emergency response team member and participates in responses for assistance within the facility, such as inpatient emergencies or to assist an outpatient or visitor with a medical emergency, they would not be considered as responding as a member of an EMS agency.

If the employing facility operates and performs functions/events that provide emergency care outside of the employing facility or health care system, then the EMS Rules and Regulations would apply to providers affiliated with those agencies. Examples would be hospital or health system owned ambulances that perform inter-facility transport services (between physically separate locations of a health care system), air medical programs, and specialized neonatal or pediatric transport programs. Those programs require licensure as an EMS agency, the EMS Regulations must be followed, and affiliated providers are governed by the scope of practice described by the Office of EMS.