The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Office of Emergency Medical Services
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ADVISORY 25-11-01

TO: Massachusetts Certified EMTs and Paramedics (EMS Personnel)
Massachusetts Licensed Ambulance Services
FROM: Susan Lewis, NRP, Director
DATE: November 18, 2025
RE: Limits on EMS Personnel Functioning as EMTs and Paramedics

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The Department of Public Health (Department) is issuing this Advisory to clarify that under the EMS statute M.G.L. c. 111C, §19(a), EMS personnel may only function as EMTs and 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. In any other context, certified EMS personnel may only provide services at the first responder level and may not advertise or hold themselves out as EMTs and Paramedics.

Therefore, when school districts are seeking to hire EMTs to staff interscholastic football or other sports games, they must make their arrangements with a licensed ambulance or EFR service, and that service must deploy an EMT or Paramedic who is on duty for the service at the time of the game. Individual EMS personnel may not hire themselves out to staff such games as EMTs or Paramedics.

Additionally, if licensed health care facilities or other entities that are not ambulance services, EFR services or Department-approved MIH or CEMS programs, hire certified EMTs and Paramedics, they cannot deploy these EMS personnel to provide any skills or services above the first responder level.

EMS personnel or ambulance services with any questions in this regard may contact Susan Lewis, NRP, Director, at oems.ambulances@mass.gov.