



Oklahoma State Department of Health  
Creating a State of Health

December 16, 2011

To: Oklahoma Certified Emergency Medical Responders  
Oklahoma Licensed Emergency Medical Technicians

From: Dale Adkerson, EMS Director   
Oklahoma State Department, EMS Director

Re: EMT's working outside of Medical Control

This information is the result of an issue the Department has been examining. Specifically, the issue is EMT's working without a medical director at private and corporate events. The intended desire is not to restrict employment opportunities for pre-hospital professionals, but to educate members of the profession of current requirements. The information presented is from current statutes and regulations.

EMR's and EMT's are often hired to provide medical supports for private events such as races, rodeos, skating events, movie sets, and concerts. The producers, sponsors, and owners of these events will hire certified and licensed personnel to provide on-site medical professionals. Personnel accept these jobs, and assumptions are made about their ability to provide care at these events. Oklahoma licensure statutes and regulations define the circumstances in which EMT's may provide care and within what scope of practice.

The ability for certified and licensed personnel to perform within their scope of practice is found in the Oklahoma Statutes. Several sections of statute and regulation have been copied for you to review.

Title 63 O.S. § 1-2506. Performance of medical procedures provides the statutory boundaries that allow EMR's and EMT's to provide care:

Licensed and certified emergency medical personnel, while a duty to act is in effect, shall perform medical procedures to assist patients to the best of their abilities under the direction of a medical director or in accordance with written protocols, which may include standing orders, authorized and developed by the medical director and approved by the State Department of Health when not in conflict with standards recommended by the Medical Direction Subcommittee of the Oklahoma Emergency Response Systems Development Advisory Council and approved by the State Board of Health. Licensure, certification and authorization for emergency medical personnel to perform medical procedures must be consistent with provisions of this act, and rules



Oklahoma State Department of Health  
Creating a State of Health

adopted by the Board. Medical control and medical directors shall meet such requirements as prescribed through rules adopted by the Board.

Oklahoma Statutes 63 O.S. § 1-2504.1 references the duty to act regarding licensed ambulance services:

A. There is a required duty to act within the licensed area upon the acceptance of an ambulance service license. All licensed ambulance services shall respond appropriately, consistent with the level of licensure, when called for emergency service regardless of the patient's ability to pay.

PART 11. MEDICAL CONTROL 310:641-3-50 (a) Requirement and 5-50 (a) and (d) Requirement and utilization references personnel being limited to authorized procedures within a defined scope of practice:

(a) While performing with a licensed ambulance service and/or a certified emergency medical response agency, emergency medical personnel shall perform authorized procedures, which may not exceed the level of license or certification.

PART 9. MEDICAL CONTROL 310:641-5-50. Requirement and utilization

(a) Emergency medical personnel, licensed, certified, or otherwise authorized by this act, may perform procedures authorized while a duty to act is in effect, only under medical control of an identifiable medical director.

To summarize the above material:

- \* Individually certified and licensed personnel do not have a “duty to act”. Licensed ambulance services have that specific requirement.
- \* Personnel working at an ambulance service are able to perform within their scope of practice the procedures authorized by a medical director.

Regarding the private and corporate events; certified and licensed personnel are able to work these venues under the following regulations and conditions:

PART 9. MEDICAL CONTROL- 310:641-5-50. Requirement and utilization

(b) Emergency medical personnel may be utilized by hospitals, health care facilities, ambulance services, and emergency medical response agencies. Health care facilities may include, but not limited to, nursing homes, doctor offices or clinics, organized industrial or private health facility services, athletic training facilities, or any other organized group who may legally render patient care.



Oklahoma State Department of Health  
Creating a State of Health

(1) While performing at a hospital and/or a health care facility, emergency medical personnel shall be limited to authorized procedures of a specific written "job description" approved by a physician, and/or medical staff, of that facility.

(2) While performing at a licensed ambulance service, emergency medical personnel may perform procedures authorized, not to exceed the level of license or certification.

Essentially, this states that if certified or licensed persons are employed outside of an ambulance service or emergency medical response agency, they are to be limited to the procedures authorized by a physician approved job description. The physician continues the medical oversight of the individual. This means that certified and licensed individuals may work within a defined scope of practice at these private and corporate events as long as a physician is providing oversight.

Lastly, anytime a licensed person is asked to perform skills and procedures when outside the oversight of a physician, this regulation must be followed:

#### PART 9. MEDICAL CONTROL

##### 310:641-5-50. Requirement and utilization

(d) While performing under any other condition or situation, emergency medical personnel, licensed or certified by this act, may perform only to the level of care as described for the Certified Emergency Medical Responder, or in accordance with the Act.

When an EMT at any level is without the authorization of medical control, the only skills that may be performed are those within the Emergency Medical Responder scope of practice. These situations may be at these private and corporate events, or driving by an accident when not on duty with your agency.

The ability for the individual EMT to perform skills under their respective scope of practice comes from a medical director. Please, do not assume your medical director has provided the authority to work outside of your agency. If you are working at these private and corporate events, contact your medical director to ensure you are under the authority of the medical director.

Please feel free to contact me if you have any questions. My phone number is 405.271.4027 or by email at [dalea@health.ok.gov](mailto:dalea@health.ok.gov)