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To: All EMS Professionals



From: Wisconsin Emergency Medical Services Section

## Use of RN and PA

There has been confusion in the past regarding the circumstances under which a registered nurse (RN) or physician assistant (PA) may perform emergency medical care while working with an EMS provider. Under Wis. Admin. Code ch. DHS 110, a Wisconsin-licensed registered nurse or physician assistant not licensed as an EMS professional may replace a certified first responder or licensed emergency medical technician (EMT) as a member of an EMS crew, or work as an adjunct to the EMS crew, if certain conditions are met. However, the presence of an RN or PA on an ambulance does not allow the EMS Service to practice at a level beyond that authorized in its scope of practice for the level it is licensed. This policy document clarifies the requirements and guidelines for use of these professionals in place of a first responder or EMT or to supplement licensed EMS professionals. The limitations placed on the use of RNs and PAs by EMS providers assure that public health and safety are protected and consistent EMS service is provided throughout Wisconsin.

### RELEVANT STATUTE AND CODE REQUIREMENTS

#### **Wisconsin Stat. § 256.15(4) Ambulance Staffing; Limitations; Rules** (in part)

(a) If a sick, disabled or injured individual is transported by ambulance, any of the following combinations of other individuals shall be present in the ambulance:

1. Any 2 emergency medical technicians, licensed registered nurses, licensed physician assistants or physicians, or any combination thereof.
2. One emergency medical technician plus one individual with a training permit issued under sub. (5)(b) or plus one first responder, subject to par. (e).

#### **Wisconsin Admin. Code § DHS 110.33 Authorized services.**

(1) An emergency medical services provider may advertise and provide only those services for which it has been licensed by the department. (2) An emergency medical services provider may advertise and provide only those services that are within the Wisconsin scope of practice for the level at which the provider is licensed. (3) An emergency medical services provider may advertise and provide only those services that are described in its department-approved operational plan...

**Wisconsin Admin. Code § DHS 110.50 EMS provider staffing requirements.**

(1) An emergency medical service provider shall satisfy the staffing requirements appropriate to the level of service for which it is licensed...

(1) (h) *Interfacility transfers.* Staffing for interfacility transfers shall be based on the needs of the patient as identified by the sending physician. A service may staff to any of the configurations in this subsection but may not exceed the level at which the service is licensed.

(2) A physician, physician assistant or a registered nurse may take the place of any EMT at any service level provided he or she is trained and competent in all skills, medications and equipment used by that level of EMT in the pre-hospital setting and provided he or she is approved by the service medical director. A physician assistant or registered nurse may not practice at a higher level of care than the level at which the service is licensed.

**Note:** To assist the service medical director in assuring competency, there are registered nurse to EMT–basic and registered nurse to paramedic transition courses available through the certified training centers. A physician, physician assistant, or registered nurse who is not licensed as an EMS professional is operating under his or her physician, nurse or physician assistant license. Any conduct subject to enforcement action under sub ch. V while operating as an EMS professional will be reported to the appropriate governing board and may affect the individual’s physician, nurse or physician assistant license.

**GENERAL GUIDELINES: RN/PA AS A MEMBER OF THE AMBULANCE SERVICE\_\_\_ [Wis. Admin. Code § DHS 110.50(2)]**

1. A registered nurse or physician assistant who takes the place of an EMT must be trained and competent in all skills, medications and equipment used by the ambulance service provider. Since EMTs may use different skills and equipment in the field than registered nurses or physician assistants, an EMS service is responsible for assuring that anyone taking the place of an EMT is competent in all skills, medications, and equipment used by the service. Under Wis. Admin. Code § DHS 110.49 (2) (j), the responsibility rests specifically with the service's medical director. A form is available on our website to assist in documentation and can be found at the following web link: <https://www.dhs.wisconsin.gov/ems/forms.htm>
2. A registered nurse or physician assistant replacing a licensed EMS professional on an ambulance as part of a legal crew may only practice to the license level of the ambulance service. Current scopes of practice for the different levels of ambulance licensure may be found on the department’s website at <https://www.dhs.wisconsin.gov/ems/licensing/scope.htm>.
3. It is very important that the EMS provider have protocols and a position description that addresses the use of RNs and PAs on the ambulance. This is both for the protection of the personnel and the EMS provider.
4. The RN/PA may only practice up to the level of the ambulance service provider’s license.
5. As a member of the ambulance service, the RN/PA must function under the ambulance service’s medical director and approved service protocols.

**GUIDELINE: RN/PA HOSPITAL STAFF ON AN AMBULANCE**

1. The sending hospital must assure that all medications and equipment the RN/PA needs to properly care for the patient are sent with the PA/RN since the ambulance service will not be equipped for the higher level of care.
2. A RN/PA employed by a sending hospital may serve as additional staff on an interfacility transport.
3. If the RN/PA is not licensed as an EMT, the RN/PA is practicing under their RN/PA license.
4. When a RN/PA is functioning as an employee of the sending hospital, they will be following the written orders of the sending physician.
5. A RN/PA from a hospital is not part of the required legal ambulance crew unless the PA/RN is also employed by the transporting ambulance service. If the RN/PA is employed by the transporting ambulance service, the RN/PA may only function to the level of the service and not at the RN level.

If you have any questions, please contact the Wisconsin EMS office at 608-266-1568 or via email at [dhsemssmail@wisconsin.gov](mailto:dhsemssmail@wisconsin.gov).