



The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
Bureau of Health Care Safety and Quality
99 Chauncy Street, Boston, MA 02111

CHARLES D. BAKER
Governor

KARYN E. POLITO
Lieutenant Governor

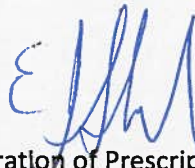
MARYLOU SUDDERS
Secretary

MONICA BHAREL, MD, MPH
Commissioner

Tel: 617-753-7300
www.mass.gov/dph

ADVISORY 16-10-01

TO: All MA Licensed Ambulance Services
CC: EMCAB Members
FROM: Eric Sheehan, JD, Director, Bureau of Health Care Safety and Quality
DATE: October 19, 2016
RE: Physician Signatures on Patient Care Reports Documenting Administration of Prescription Medications



The purpose of this Advisory is to clarify how ambulance services can meet the requirement of M.G.L. c. 94C and the Department of Public Health's (Department's) Drug Control Program (DCP) regulation, 105 CMR 700.003(A)(3)(d) that Emergency Medical Service (EMS) personnel may administer controlled substances only pursuant to the order of a practitioner and the Statewide Treatment Protocols.

Pursuant to these legal requirements, EMS patient care reports (PCRs) that document administration of controlled substances must be signed by a physician. The Department has determined that the most appropriate physician to sign the PCRs is the service's affiliate hospital medical director (AHMD). The AHMD need not sign the PCR the day the patient is brought into the hospital, but may sign the PCR during his or her regular reviews of PCRs, within a two-week period of the EMS call.

The Department's DCP and OEMS programs recognize that the "order" for the medication is in the Statewide Treatment Protocols (STPs), either as standing orders, or as options requiring a call to, and then authorization of, an on-line medical control physician. The PCR contains the patient information, and the controlled substance(s) provided. As a result, the Department will accept the service's AHMD's signature on the PCR as the signature of the ordering practitioner, based on the STPs and any necessary online medical control order, after the AHMD has reviewed the PCR.