

OFFICE OF EMERGENCY MEDICAL SERVICES
Administrative Requirements Manual

EFFECTIVE: September 8, 2010 AUTHORIZATION: AR PAGE: 1 of 7

A/R TITLE: ALS INTERFACILITY TRANSFERS

SUPERSEDES: January 8, 2009

This Administrative Requirement may be effectuated by an ambulance service only upon appropriate training of its EMS personnel.

Minimum Standards for Interfacility Transfers:

1. Staffing, Training

Minimum staffing at the Intermediate level requires one EMT-Basic and one EMT-Intermediate. Minimum staffing at the Paramedic level requires one EMT-Paramedic and one EMT-Intermediate or EMT-Basic, in accordance with 105 CMR 170.305(C)(2).

EMTs providing patient care during Interfacility Transfers must meet the following requirements as outlined in 105 CMR 170.000 et al:

- a. current certification as an EMT in Massachusetts;
- b. completion of Department approved supplemental training that is specific to and consistent with levels of certification of involved EMTs and includes
 - expanded roles and responsibilities
 - additional, approved treatment modalities, equipment, devices, and technologies; and
 - ambulance service policies and procedures regarding ALS Interfacility Transfers
- c. has maintained current authorization to practice pursuant to the Affiliate Hospital Medical

Director's review of clinical competency

Guidelines for approved ALS Interfacility Transfer training programs have been issued separately by the Department. It shall be the responsibility of the transferring ambulance service to ensure and to verify appropriate training of its personnel providing ALS Interfacility Transfers.

2. Affiliation Agreements; Medical Control

An ambulance service must be licensed at an ALS level by the Department to provide ALS care during Interfacility Transfers, and it must maintain an affiliation agreement, in accordance with 105 CMR 170.300, with a hospital licensed by the Department for Medical Control, pursuant to 105 CMR 130.1501-130.1504 of the Hospital Licensure regulations. Such affiliation agreements must designate an Affiliate Hospital Medical Director (105 CMR 170.300(A)(2) and 105 CMR 130.1502(C)), whose medical oversight functions are defined in 105 CMR 130.1503. Standards for Affiliate Hospital Medical Directors are defined in 105 CMR 130.1504.

3. Communications:

All communications with a Medical Control physician must be recorded.

4. Scope of Practice:

Section 170.360(A) of the EMS Regulations states, "No ambulance service or agent thereof shall transport a patient between health care facilities who is receiving medical treatment that is beyond the training and certification capabilities of the EMTs staffing the ambulance unless an additional health care professional with that capability accompanies the patient..." Depending on the individual's

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condition, there may be situations in which a physician or some other specialist's presence might be necessary; such determination shall be made by the on-line medical control physician in consultation with the physician at the sending hospital. All involved in this decision should consider whether the benefits of the transfer sufficiently outweigh the risks; a patient's greatest benefit may result from being transported by a standard IFT crew to a higher level of hospital care rather than delay for other transport.

The scope of practice for each EMT level is defined (1) in regulation (105 CMR 170.800, 170.810, 170.820 and 170.840), (2) through established training programs approved by the Department, and (3) through the Statewide Treatment Protocols consistent with the Interfacility Transfer Guidelines.

The following are patient condition classifications and corresponding requirements for EMT personnel during ambulance transport:

- a. Routine, scheduled transport; Patient clearly stable for transport with no requirement for airway management, IV maintenance and/or cardiac monitoring.

Minimum Staffing: BLS licensed ambulance service; two EMT-Basics

- b. Patient clearly stable for transport (as above) who has a "maintenance" IV running without additives; (e.g., cancer patient transported for radiation therapy, with unadulterated crystalloid IV solution running).

Minimum Staffing: ALS-Intermediate licensed ambulance service; one EMT-Intermediate attending to patient care and one EMT-Basic driving

- c. Patient with an acute or subacute problem, who is either completely or, at least, to the best of a facility's ability, stabilized; who has the potential to become less stable during transport. Instrumentation or medication running must be consistent with the Interfacility Transfer Guidelines.

Minimum Staffing: ALS-Paramedic licensed ambulance service; one EMT-Paramedic and one EMT-Intermediate or EMT-Basic, in accordance with 105 CMR 170.305(C)(2). The EMT with the highest level of certification must attend to patient care.

- d. Patient with an acute problem with high potential to become unstable; Critical care patient with any other instrumentation or medication running that is not included in the Interfacility Transfer Guidelines.

Minimum Staffing: Appropriate additional medical personnel (per 170.360(A)) must accompany the patient during transfer; any level of ambulance service licensure; two EMT-Basics. The ALS Interfacility Transfer Subcommittee recommends that the referring hospital consider Critical Care Transport for such a patient. In the event that CCT is unavailable, medical personnel accompanying the patient must be able to manage all equipment and instrumentation associated with the patient's care and provide advanced resuscitative measures if needed.

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- e. Critical Care Transports (see 105 CMR 170.000, for regulatory requirements regarding critical care transport).

Under no circumstances shall EMTs function or be assigned to transfers beyond, or potentially beyond, the scope of their training and level of certification. The scope of practice for all EMTs is limited to the levels of EMT certification and training and by licensure level of the ambulance service by which they are employed.

If (1) a patient's medical condition necessitates immediate transport to another health care facility and (2) the patient's medical treatment during transport will exceed the level of licensure of the transferring ambulance service and/or level of certification of the transferring ambulance's personnel, and (3) the transferring facility will not provide appropriate additional personnel pursuant to 105 CMR 170.360(A), Critical Care Transport by ground or air should be employed.

The transferring facility may at any time opt to exceed these minimum requirements by transferring patients in BLS ambulances with appropriate medical personnel as defined in 170.360(A) or by Critical Care Ground or Air Transport.

5. Quality Assurance/Quality Improvement

- a. Ambulance services providing ALS Interfacility Transfers shall be required to have quality assurance/quality improvement policies specific to ALS Interfacility Transfers in conjunction with both their affiliate hospital medical directors and their ambulance service medical directors, if any, and include at a minimum:
- review of appropriateness of transfers, denials, and conformance with EMTALA regulations;
 - review of critical skills (e.g., intubations, cardiac arrest management, IV therapy), and other measures of system function as deemed appropriate by the Department;
 - steps for system improvement and individual remediation, available for Department review, of cases found to be deficient in critical interventions
- b. Ambulance services shall report to the Department and the Affiliate Hospital Medical Director any violations of 105 CMR 170.000, this Administrative Requirement and/or prevailing treatment protocols as they relate to ALS Interfacility Transfers.
- c. EMT skill maintenance and didactic knowledge will be continually assessed and appropriate measures taken to ensure quality of patient care by affiliate hospital medical directors and by ambulance service medical directors, if any.

6. Patient ALS Transfer Procedure

Once an ALS Interfacility Transfer has been deemed appropriate by the transferring ambulance service (see "Scope of Practice" above), paramedic staff, upon arrival at the transferring facility, will:

- receive a report from the staff of the transferring facility;

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- assess the patient; and
- in cases where the patient's care during the transfer exceeds the standing-order scope of practice as defined by the current version of the Statewide Treatment Protocols for an EMT-Paramedic or the patient is unstable or is likely to become unstable as defined previously (see "Scope of Practice" above) will provide a concise, complete and accurate patient report to an On-Line Medical Control physician, according to the EMS service's and the Affiliate Hospital's policies and procedures. When EMTs have a concern regarding the safety of the patient being transferred, the EMT-Paramedic will contact an On-Line Medical Control physician for guidance.

The report should include, at a minimum, the following information:

- a. Names of transferring and receiving facilities;
- b. Patient's diagnosis;
- c. Reason(s) for transfer;
- d. Brief history of present illness and any intervention(s) which has occurred to date;
- e. Pertinent physical findings;
- f. Vital signs;
- g. Current medications and IV infusions;
- h. Presence of or need for additional medical personnel;
- i. Anticipated problems during transport, if any;
- j. Anticipated transport time; and
- k. Staffing configuration of the transporting ambulance

NOTE: Complete copies of all pertinent medical records, including X-Rays, CT Scans, consultative notes and ECGs, as available, must accompany the patient to the receiving facility.

When necessary, the Medical Control Physician and paramedic will discuss with the transferring physician the orders for maintenance of existing and/or addition of new therapies according to the needs of the patient, within the scope of existing treatment protocols and EMT scope of practice. The Medical Control Physician will be responsible for all actions/interventions initiated by the EMS personnel during transport unless the referring physician accompanies the patient.

It is the responsibility of the Medical Control Physician or the Affiliate Hospital Medical Director (or physician designee) when on-line medical control is not contacted to sign the EMS patient care report; a signature must be obtained as soon as practicable after the transfer, or service policy should specify that the AHMD will be considered the signatory on all unsigned reports.

If the transferring physician is unavailable, or the patient is unstable, the Medical Control Physician may recommend to the transferring facility additional therapies prior to the transfer of the patient in the interest of patient safety and quality care.

In some situations, consistent with the intent of EMTALA, the transfer of a patient not stabilized for transport may be preferable to keeping that patient at a facility incapable of providing stabilizing care. If the transferring facility cannot provide appropriate medical care or appropriately trained and experienced personnel to accompany the patient, alternative means of transfer, including Critical Care Transport, must be utilized. The use of a local emergency ambulance service is strongly discouraged in such a situation.

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All such responses must be reported by the ambulance service to the Department's Division of Health Care Quality and the Affiliate Hospital Medical Director for review. It is primarily the responsibility of the referring physician and Medical Control Physician to determine the appropriate method of transferring an unstable patient.

When a facility sends its own staff with the patient during transfer (additional medical personnel) and the patient's condition deteriorates en route, EMS personnel must contact the Medical Control Physician for appropriate intervention orders and notify the receiving facility of the change in patient status.

If the accompanying staff is an RN s/he will maintain patient care responsibility, functioning within his/her scope of practice and under the orders of the transferring physician. The Paramedic and the RN will work collaboratively in the provision of patient care. If the patient's condition deteriorates en route, the Paramedic may assume full responsibility in conjunction with their Medical Control Physician for care that exceeds the RN's scope of practice and/or the transferring physician's medical orders. Prior to transfer with an RN, the referring physician must contact the service's Medical Control Physician and provide staffing rationale.

If the accompanying staff includes a physician from the transferring facility, that physician shall be in charge of patient care. Prior to transfer, the transferring physician accompanying the patient must contact the service's Medical Control Physician and coordinate patient care between the physician-in-charge and the paramedic practicing within Statewide Treatment Protocols. Clear lines of command and responsibility shall be established prior to transport.

Interstate ALS Interfacility Transfers

Interstate transfers are permitted. Paramedics must obtain Medical Control through normal channels, through the Affiliation Agreement for Medical Control of the ambulance service for which they are working. Appropriate provisions for re-contacting the Medical Control physician en route, if necessary, should be made prior to departure from the transferring facility. If a transfer originates out of state and no contact with Medical Control Physician is possible, the transfer should be made at the BLS level only with appropriate additional personnel provided by the transferring facility.

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Interfacility Transfer Medications (in addition to required medication):

Any of the following medications, not currently part of the Statewide Treatment Protocols, may be used in the Interfacility Transfer setting, if they have been instituted by the sending facility. Unless otherwise stated, the transfer paramedics may continue and monitor, but not institute these medications and infusions, except as superseded by the Statewide Treatment Protocols.

aminophylline;
antibiotics;
anti-sepsis support medications; ++
blood products;
10% Dextrose (D10);
digoxin;
antidysrhythmics, cardiac, and pressor agents; ++
anticonvulsants; ++
glycoprotein IIb/IIIa inhibitors; ++
heparin;
insulin infusions;
mannitol infusions; ++
benzodiazepines, narcotics, anesthetics, or sedatives;
paralytics;
nitroglycerin in all forms;
octreotide;
intravenous steroids; ++
standard IV infusion fluids (1/2 NS, D5 1/2 NS, D5 1/4 NS, D5, LR, etc.);
electrolyte infusions;
thrombolytic agents; ++
parenteral nutrition (PPN or TPN) (via central or peripheral IV lines);
other medications as approved by the OEMS state medical director.

NOTE: Although the sending facility may have initiated medication(s), paramedics MUST be familiar with all of the above medications that the patient may be receiving at the time of transfer. Reminder: interfacility medications are not to be initiated by Paramedics (except under special project waiver).

++ above indicates that a non-Statewide Treatment Protocol medication of this category may be given en route as a repeated bolus if already given at the sending facility, if the

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paramedics are trained in the use of the medication in bolus form, and if so ordered by medical control.

It is the responsibility of the service's affiliate hospital medical director to train personnel in the medications necessary to carry out IFT in their areas of responsibility.

Interfacility Equipment Monitoring allowed*:

Ventilators
Central & Arterial lines
Chest Tubes and accompanying hardware
Feeding tubes
Femoral Sheath
NG Tubes
PICC Lines
Infusion pumps (including insulin infusion devices)
Bladder Irrigation
Internal Pacemakers
ICP monitors not in active use
Wound suction devices
BiPAP
CPAP

*Based upon accepted in-service training and certification and, as above, these skills are directed at the continuation and monitoring of these devices, and not their institution or initiation, which have been accomplished at the sending facility. (Note: Intra-aortic balloon pumps are specifically excluded, and will require appropriately trained/certified personnel for use during Interfacility Transfer).