



EMS Special Memorandum - #24-002

Date: November 1, 2024

To: Mendocino/ Sonoma County EMS Providers and System Stakeholders

From: Bryan Cleaver
Regional EMS Administrator

Mark Luoto, MD
Regional EMS Medical Director

Re: Accreditation Authorization Process for EMT Administration of Draw-up Epinephrine 2024

The intent of this EMS Special Memo is to provide the process for accreditation of Emergency Medical Technicians certified by CVEMSA to administer epinephrine via an approved draw-up (Draw-Epi) program as Local Optional Scope of Practice (LOSOP).

This LOSOP enhancement consistent with California Code of Regulations (CCR) Title 22 Section 100064 that allows local EMS Agencies to accredit EMTs beyond basic scope of practice. This EMS Special Memo outlines the requirements for EMTs to receive accreditation authorization.

Individual Eligibility

To be eligible for Draw-Epi accreditation, EMTs must:

- Have a current active California EMT Certificate
- Have an affiliation with a Provider Agency within the CVEMSA region meeting the requirements of this Special Memo
- Complete CVEMSA-approved training and demonstrate competency

To be eligible to administer draw up epinephrine, EMTs must be on duty with their approved Provider Agency.

Individuals holding a valid California Paramedic license, but not accredited to practice within the CVEMSA region, may accredit as Draw-Epi providers under this process. Provider affiliation requirements for non-accredited paramedics are the same as those for EMTs.

Provider Agency Eligibility and Approval

Provider Agencies must provide a letter to CVEMSA identifying the provider agency medical director who will be designated an Optional Skills Medical Director (OSMD) for the purpose of the accreditation process. OSMDs are responsible for the oversight of EMTs sponsored by the Provider Agency, although they may delegate the performance of oversight activities to designated licensed staff at the paramedic level or higher. OSMDs shall be designated by agreement between CVEMSA Medical Director and OSMD specifying the scope of responsibilities delegated to the OSMD. Upon receipt of letter and signed OSMD/Medical Director designation agreement, CVEMSA may authorize Provider Agency as an approved Draw-Epi agency.

Sponsoring OSMDs must verify the training and competency of their sponsored EMTs and are responsible for ensuring ongoing clinical competency. OSMDs may sponsor EMTs of affiliated or partnered agencies if an agreement exists between the agencies verifying the OSMD has oversight of the LOSOP program.

Process for individual EMT approval

To obtain accreditation as a Draw-Epi provider, EMTs must complete CVEMSA-approved training and demonstrate competency to their sponsoring Provider OSMD. Sponsoring OSMDs will submit a roster (updated as needed) of those EMTs the OSMD has verified have completed training and verified as competent and are affiliated with the Provider agency.

Upon receipt of completed roster, CVEMSA will review and provide a letter of accreditation to practice to the sponsoring OSMD and Provider Agency. Provider Agencies will be responsible for notifying their sponsored EMTs of their status as Draw-Epi providers under the LOSOP accreditation authorization. CVEMSA will not issue individual letters or accreditation cards for EMTs accredited under the Special Memo accreditation authorization.

Quality Management

Sponsoring OSMDs are responsible for monitoring quality of care delivered by their sponsored EMTs and addressing any identified need for remediation. Sponsoring OSMDs may suspend sponsorship for competency concerns at any time. If a sponsoring OSMD suspends sponsorship of any EMT, the emergency accreditation authorization granted via this EMS Special Memo is considered suspended as well. Sponsoring OSMDs must report any suspension of sponsorship to CVEMSA within 24 hours. CVEMSA shall investigate any occurrence of suspended sponsorship in collaboration with the OSMD and sponsoring Provider Agency.

Disciplinary Process

For the purpose of this special memo authorization process any individual failing to demonstrate competency after initial approval shall be offered an opportunity to undergo remedial education per the sponsoring Provider Continuous Quality Improvement Plan. Individuals unable to demonstrate competency after a remediation attempt are subject to EMS Agency action against their accreditation authorization in accordance with CCR Title 22, Division 9, Chapter 6.

Grandfather Provisions and Limited Term

EMTs accredited via EMS Special Memorandum 22-004 or 23-003 shall be deemed reauthorized as accredited concurrent with the term of this special memo. The special memo accreditation process and any authorizations issued described herein shall be valid through November 1, 2025.

Links:

[22-004 Addendum A OSMD-verified competency accreditation roster](#)

[22-004 Addendum B MOU for designation of OSMD by CVEMSA Medical Director](#)

[22-004 Addendum C CVEMSA-Approved Training and Competency Assessment Checkoff](#)

[22-004 Addendum D Alternative Medical Direction for Draw-Epi Approved Providers Training Video courtesy Marin County Fire Department](#)