

## JOINT POSITION STATEMENT

### North Carolina State Board of Dental Examiners and Office of Emergency Medical Services

#### EMS PERSONNEL FUNCTIONING IN DENTAL OFFICE SETTINGS

The North Carolina Board of Dental Examiners and the Office of Emergency Medical Services issues this joint statement for the purpose of providing guidance to North Carolina-licensed dentists and EMS Personnel regarding the current regulatory framework governing permissible practice settings for EMS Personnel in North Carolina. "EMS Personnel" refers to Paramedics, Emergency Medical Technicians, and Advanced Emergency Medical Technicians who have completed an educational program approved by the OEMS and have been credentialed at the respective level by the OEMS. See G.S. 131E-155(7).

**Executive Summary: Under the current regulatory framework, EMS Personnel may not function as such in a dental office setting under the supervision of a dentist licensed by the North Carolina Board of Dental Examiners but not licensed by the North Carolina Medical Board.**

#### Statutes and Rules Governing the Practice of EMS Personnel

G.S. 143-508(d)(6)-(7) gives the North Carolina Medical Care Commission the responsibility and authority to establish rules which implement the scope of practice of credentialed EMS Personnel and define their practice settings. The rules governing these aspects of EMS Personnel practice are found in 10A NCAC 13P .0505 and .0506.

10A NCAC 13P .0505 states that credentialed EMS Personnel who are "functioning under physician medical oversight" may administer IV fluids and medications and perform other acts as allowed by the North Carolina Medical Board.

10A NCAC 13P .0506(a) states that EMS Personnel may function in certain listed practice settings in accordance with protocols approved by the OEMS and the medical director of the EMS System or Specialty Care Transport Program with which the personnel are affiliated.

10A NCAC 13P .0506(b) states that EMS Personnel may function in an "alternative practice setting" that is not affiliated with an EMS System, provided that the EMS Personnel is:

1. "under the medical oversight of a physician licensed by the North Carolina Medical Board that is associated with the practice setting where the individual will function," and
2. "restricted to performing within the scope of practice as defined by the North Carolina Medical Board pursuant to G.S. 143-514 for the individual's level of EMS credential."

An "alternative practice setting" is defined as "a practice setting that utilizes credentialed EMS personnel that may not be affiliated with or under the oversight of an EMS System or EMS System Medical Director." 10A NCAC 13P .0102(4).

## EMS Personnel and Dental Office Settings

Although a dental office could fall within the definition of an alternative practice setting, the rules governing EMS Personnel practice scope and settings require that EMS Personnel function under the medical oversight of a physician licensed by the Medical Board, regardless of whether the EMS Personnel are functioning in a traditional setting or an alternative practice setting. These rules would allow EMS Personnel to function as such in a dental office setting only if under the supervision of an oral surgeon licensed by the Medical Board. Under the current regulatory framework, EMS Personnel may not function as such in a dental office setting under the supervision of a dentist licensed by the Dental Board but not by the Medical Board (hereafter, "Dental Office").

A dentist holding a permit issued by the Dental Board to administer sedation (a "Permittee") may desire to engage a paramedic or AEMT to work in their Dental Office and assist with sedation procedures with the goal of heightening patient safety. Under the current rules governing EMS Personnel practice, the EMS Personnel would not be permitted to perform any functions in the Dental Office beyond those performed by other dental assistants serving as auxiliaries during the sedation procedure and utilizing skills from Basic Life Support ("BLS") certification.

EMS Personnel working in a Dental Office currently could perform the following example permitted functions as one of the two required BLS-certified auxiliaries:

- Obtaining health history, current medications, allergies, vital signs, preliminary examinations (including as to airway), and other medical information necessary for the Permittee to properly assess the patient for sedation and surgery;
- Facilitating medical consultations with a patient's treating physician prior to a sedation procedure when deemed necessary or advisable by the Permittee;
- Setting up and monitoring patients and vital signs as the dedicated sedation auxiliary during the sedation procedure and while in recovery;
- Recording sedative, anesthetic, and other medications administered by the Permittee;
- Assessing patients for discharge after recovery, subject to approval from the Permittee; and
- In a medical emergency, assisting by utilizing skills from BLS certification.

EMS Personnel working in a Dental Office currently cannot perform other functions that may be authorized under their scope of practice if they were working in a permitted practice setting under the supervision of a licensed physician, nor utilize skills from Advanced Cardiac Life Support ("ACLS") certification. The following are examples of functions currently prohibited for EMS Personnel working in a Dental Office:

- Starting an intravenous ("IV") or intraosseous ("IO") vascular access for a patient;
- Preparing sedation medications (e.g., draw a dose into a syringe);
- Delivering sedation medications to patients except in limited circumstances allowed for a dental assistant (see **Interpretative Statement** referenced below);
- Administering reversal medications; and

- Intubating a patient or inserting a supraglottic airway device such as a laryngeal mask airway (“LMA”) or i-gel.

The Dental Board and OEMS are working collaboratively with the goal of a future expansion of the potential practice settings for EMS Personnel to include Dental Office settings. Until that future time, EMS Personnel working in a Dental Office under a dentist's supervision may not perform any duties exceeding those delegable to other non-dentist staff members pursuant to the Dental Board's rules and consistent with the Dental Board's previously issued guidance in its **Interpretive Statement Regarding Auxiliaries Providing Assistance in Administering Sedation or Anesthesia**, March 16, 2020.

This joint position statement addresses only the permissibility of EMS Personnel functioning in Dental Offices under the current rules. This statement does not address or express any opinion regarding potential liability issues related to EMS Personnel working in Dental Offices as dental auxiliaries and only able to perform limited functions noted above under the current regulations, even during patient emergencies.

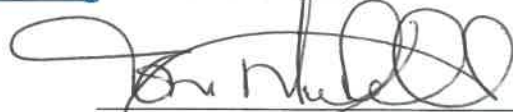
Specific questions about EMS Personnel responsibilities should be addressed to the NC Office of Emergency Medical Services at [oems.nc.gov](http://oems.nc.gov) or at 919-855-3935.

Specific questions about dentist and Permittee responsibilities should be addressed to the NC State Board of Dental Examiners at [www.ncdentalboard.org](http://www.ncdentalboard.org) or at 919-678-8223.



Bobby D. White  
Chief Executive Officer  
North Carolina State Board of Dental Examiners

1 May 2023  
Date



Tom Mitchell, Paramedic  
Chief  
North Carolina Office of EMS

May 15, 2023  
Date