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Office of Emergency Medical Services  
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**ADVISORY 23-11-01**

TO: Massachusetts Licensed Ambulance Services and Accredited Training Institutions  
FROM: Susan Lewis, NRP, Director  
DATE: November 27, 2023  
RE: CPR and ACLS Training Requirements – Hands-On Skills Evaluation Component

The Massachusetts Department of Public Health (Department) has become aware that there are EMTs who are using credentials for cardiopulmonary resuscitation (CPR) and/or Advanced Cardiac Life Support (ACLS) courses that do not meet the requirements of the EMS System regulations. Some courses do not have a hands-on skills evaluation component, as required to renew certification and/or present to their ambulance services as part of their required credentials. The Department is aware that some ambulance services have erroneously accepted these credentials as valid.

This is to remind all ambulance services and accredited EMT training institutions and their EMS personnel and students of the following EMS System regulation requirements.

- Under 105 CMR 170.810(C)(1), “CPR training must be obtained through an instructor-led program or blended learning experience with an in-person hands-on skills evaluation and must include a cognitive examination.” Similarly,
- Under 105 CMR 170.840(B)(3), for ACLS training, “ACLS training must be obtained through an instructor-led program or blended learning experience with an in-person hands-on skills evaluation and must include a cognitive examination.”
- Under 105 CMR 170.285, ambulance services are required to ensure their EMS personnel have valid current credentials in CPR (and for their paramedics, in ACLS). EMS personnel must carry this CPR, and/or ACLS documentation, in electronic or print format. If carrying documentation in electronic format, the EMS personnel must be prepared to demonstrate the validity upon request.

The Department has learned that some EMTs are taking CPR or ACLS courses that are entirely online. Sponsors of these courses provide them a completion card or certificate that can look deceptively like those issued by other training entities that **do** include a hands-on skills evaluation component in their courses. Ambulance services are encouraged to exercise caution when reviewing credentials provided by EMTs, to ensure the course included a hands-on, in-person skills evaluation. Frequently, unacceptable certificates describe completion of course requirements and cognitive evaluation, and not a skills evaluation.

Further, the Department has learned that some EMTs who hold CPR and/or ACLS instructor credentials are using those as substitutes for meeting the requirement for CPR or ACLS provider credentials. While some training sponsors require a person to have a valid CPR and/or ACLS provider certification to receive initial instructor credentials, some sponsors may not require ongoing renewal of provider credentials in order to renew instructor certification. Therefore, the instructor credential may be renewed without the evaluation of demonstration of hands-on skills by the holder, which does not meet the EMS System regulations. The instructor credential alone is not adequate as meeting the regulatory requirement for CPR and/or ACLS training. Please ensure EMTs and instructors are maintaining a provider credential in addition to instructor credentials, as required.

Ambulance services and accredited training institutions with any questions in this regard may contact Daniel Saxe, Education and Certification Supervisor, at [oems.recert@mass.gov](mailto:oems.recert@mass.gov).