

Bureau of Emergency Medical and Trauma Services

RN Exception - Guidance Summary

Purpose

This document provides guidance on the Registered Nurse (RN) Exception as it applies to staffing authorized EMS rotor-wing (helicopter) ambulance service programs within the State of Iowa.

Background

The RN Exception has been part of Iowa Code 147A for decades and supports the longstanding role of registered nurses in rotor-wing ambulance programs. Iowa law allows an RN to staff an EMS service program when the RN demonstrates equivalency in education and skills essential for out-of-hospital emergency care. The RN Exception remains an important mechanism for maintaining high-quality clinical staffing in air medical operations.

RN Exception Requirements

Under Iowa Code 147A.12, a registered nurse licensed under Chapter 152 may function in an EMS service program if equivalency is documented and approved. Equivalency must include:

- Review and approval of training and skills documentation by the service program's medical director.
- Authorization granted by the Iowa Department of Health and Human Services.

Once authorized, an RN Exception is assigned one EMS clinician level (EMR, EMT, AEMT, Paramedic, or Paramedic/CCP) and must function within the defined scope of practice for that level while staffing the EMS service program.

Rotorcraft Ambulance Staffing Requirements

Iowa Administrative Code 641-132.3(4)c(2) outlines minimum staffing for rotor-wing ambulance transports. Each flight transporting a patient must include:

- Two healthcare clinicians licensed or certified in the state of aircraft launch, with at least one certified as a paramedic.
- One FAA-certified commercial pilot appropriately rated for the aircraft.

An RN authorized under the RN Exception at the paramedic level fulfills the requirement that one of the clinicians must be a paramedic.

Application in Rotorcraft Staffing Models

Rotorcraft ambulance programs commonly utilize the RN Exception for RN staff. When two RNs staff a rotor-wing transport:

- One RN must be functioning as an authorized RN Exception at the paramedic level.
- The second RN may function under their standard RN license and scope. This approach aligns with established precedent from the Bureau of Emergency Medical and Trauma Services.

Summary

The RN Exception provides a structured, legally recognized pathway for registered nurses to function in EMS roles, including at the paramedic level, when properly authorized. In the circumstance where the rotorcraft is staffed by two RNs, one must function under the RN Exception, and the other may function under their RN license and scope, even if both RNs are authorized as RN exceptions. It supports operational flexibility and ensures rotorcraft ambulance services remain compliant with Iowa Code and Administrative Rules while maintaining high standards of emergency medical care.