



STATE OF MICHIGAN

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
LANSING

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**MEMORANDUM**

**DATE:** March 5, 2026

**TO:** Licensed Michigan Advanced Life Support (ALS) Agencies  
Michigan Medical Control Authorities  
Participating Hospital Pharmacies

**FROM:** Michigan Department of Health and Human Services  
Division of EMS and Systems of Care

**SUBJECT:** Michigan EMS Agencies Compliance with DEA Final Rule Implementing  
the Protecting Patient Access to Emergency Medications Act

On February 8, 2026, the United States Drug Enforcement Administration (DEA) published a Final Rule implementing the federal Protecting Patient Access to Emergency Medications Act (PPAEMA) (21 C.F.R. 1300–1317). The Rule establishes a federal registration framework for Emergency Medical Services (EMS) agencies that handle controlled substances. The Final Rule becomes effective on March 9, 2026.

MDHHS recognizes that certain provisions of the Final Rule require careful alignment with Michigan's existing statutory and administrative framework governing EMS agencies, medical control authorities, and participating hospital pharmacies. In coordination with the Michigan Department of Licensing and Regulatory Affairs (LARA), we are actively developing a structured compliance pathway to ensure that Michigan's EMS system can meet federal requirements while remaining consistent with Michigan law and established medication distribution and oversight processes (including R 325.22134 and R 325.22207).

The State of Michigan will continue to coordinate with LARA and the DEA as this situation takes shape. At this time, it is our understanding that, with respect to EMS agencies and controlled substances under the Final Rule and PPAEMA, Michigan EMS operations should **continue as usual**. Accordingly, ALS agencies, medical control authorities, and participating hospital pharmacies should maintain current practices regarding controlled substance procurement, storage, security, documentation, and oversight under existing Michigan statutes, administrative rules, and department approved protocols unless and until further guidance is issued.

MDHHS anticipates issuing additional formal guidance as information becomes available outlining the operational framework through which Michigan EMS agencies will be able to fully comply with the DEA Final Rule.