GRADUATES OF PHYSICAL THERAPIST EDUCATION PROGRAMS, NOT YET LICENSED, WORKING IN THE FIELD OF PHYSICAL THERAPY

Pursuant to A.R.S. §32-2043, <u>Supervision</u>; <u>patient care management</u>, graduates of physical therapist education programs who are not yet licensed or certified may engage in the practice of physical therapy on a limited basis.

Graduates of physical therapist education programs fall within the definition of "assistive personnel" at A.R.S. §32-2001(1), "includes physical therapist assistants and physical therapy aides and other assistive personnel who are trained or educated health care providers and who are not physical therapist assistants or physical therapy aides but who perform specific designated tasks related to physical therapy under the supervision of a physical therapist" (emphasis added). A.R.S. §32-2043 states that a physical therapist may delegate to assistive personnel and supervise selected acts, tasks or procedures that fall within the scope of physical therapy practice, but that do not exceed the education or training of the assistive personnel. The acts, tasks and procedures that can be delegated to a graduate must be commensurate with the education and training that the graduate received in the graduate's physical therapist education program, with exceptions. The supervising physical therapist determines what acts, tasks and procedures will be delegated to assistive personnel, including graduates, in accordance with A.R.S. §32-2043(A).

A.R.S. §32-2043(F) states "a physical therapist is responsible for managing all aspects of the physical therapy care of each patient. A physical therapist must provide: 1) the initial evaluation and documentation for a patient; 2) periodic reevaluation and documentation of a patient; 3) the documented discharge of a patient . . .". A physical therapist is defined at A.R.S. §32-2001(6) as "a person who is licensed pursuant to this chapter". A graduate is therefore precluded from performing any of the tasks identified in A.R.S. §32-2043(F).

The statutes do not allow a graduate of a physical therapist education program who is not yet licensed as a physical therapist to supervise physical therapy assistive personnel. A.R.S. §32-2043(A) states that a only a physical therapist may delegate selected acts, tasks or procedures to assistive personnel.

The statutes do not recognize the designation "SPT" which is commonly used by physical therapist students during the students' clinical internships. Pursuant to A.R.S. §32-2042, <u>Use of titles</u>, graduates may not use the designation of "PT", "MPT", nor "DPT". Graduates must designate the graduate's employment status as assistive personnel in any documentation. Any notes recorded by a graduate must be co-signed by the supervising physical therapist.

According to A.R.S. §32-2043(G), prior to delegating any tasks a physical therapist must verify the qualifications of physical therapist assistants and other assistive personnel under the physical therapist's direction and supervision. Additionally, A.R.S. §32-2043(H) requires the physical therapist to also determine on each date of service whether treatment for that date requires the expertise of the licensed physical therapist and whether it is appropriate to delegate those activities to the assistive personnel, as well as the basis for the determination of delegation of a particular act, task or procedure as appropriate for that assistive personnel to undertake with a particular patient on a particular date of service.

This substantive policy statement is advisory only. A substantive policy statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules made in accordance with the Arizona administrative procedure act. If you believe that this substantive policy statement does impose additional requirements or penalties on regulated parties you may petition the agency under Arizona Revised Statutes section 41-1033 for a review of the statement.