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## **New Credentialing Requirements for Washington’s Medical Assistants Effective July 1, 2013**

Last year, the Washington State Legislature passed a bill creating four new professions, each a category of medical assistant (“MA”): Medical Assistant-Certified, Medical Assistant-Registered, Medical Assistant-Hemodialysis Technician, and Medical Assistant-Phlebotomist.

To practice as any of these four new categories of MA, a person is required to be certified or registered by the Washington State Department of Health (“DOH”). A summary of the qualifications for certification and registration and the scope of practice for each category of MA is below in Table 1.

An MA is authorized to perform the tasks within his or her scope of practice when those tasks are “delegated” by and under the supervision of a “health care practitioner.” “Health care practitioner” is defined as (1) a physician; (2) an osteopathic physician or surgeon; or (3) acting within the scope of their respective licensure, a podiatric physician and surgeon, a registered nurse or advanced registered nurse practitioner, a naturopath, a physician assistant, an osteopathic physician assistant, or an optometrist. “Delegation” is defined as “direct authorization granted by a licensed health care practitioner to a medical assistant to perform the functions authorized in [chapter 18.360 RCW] which fall within the scope of practice of the health care provider and the training and experience of the medical assistant.” “Supervision” is defined as “supervision of procedures permitted pursuant to [chapter 18.360 RCW] by a health care practitioner who is physically present and is immediately available in the facility, but does not need to be present during procedures to withdraw blood.”

Prior to delegating a task to an MA, a health care practitioner must determine to the best of his or her ability each of the following: (1) that the task is within that health care practitioner’s scope of licensure or authority; (2) that the task is indicated for the patient; (3) the appropriate level of supervision; (4) that no law prohibits the delegation; (5) that the person to whom the task will be delegated is competent to perform that task; and (6) that the task itself is one that should be appropriately delegated. Whether the task is one that should be appropriately delegated is determined by consideration of the following factors: (1) that the task can be performed without requiring the exercise of judgment based on medical knowledge; (2) that results of the task are reasonably predictable; (3) that the task can be performed without a need for complex observations or critical decisions; (4) that the task can be performed without repeated medical assessments; (5) for an MA other than a Medical Assistant-Hemodialysis Technician, that the task, if performed improperly, would not present life-threatening consequences or the danger of immediate and serious harm to the patient, and (6) for a Medical Assistant-Hemodialysis Technician, that the task, if performed improperly, is not likely to present life-threatening consequences or the danger of immediate and serious harm to the patient.

The Health Care Assistant (“HCA”) credential is eliminated effective July 1, 2016. When an HCA whose certification is in good standing and who was certified prior to July 1, 2013 renews his or her certification, DOH will (1) certify a category C, D, E, or F HCA who was certified prior to the effective date of the legislation as a Medical Assistant-Certified; (2) certify a category G HCA who was certified prior to the effective date of the legislation as a Medical Assistant-Hemodialysis Technician; and (3) certify a category A or B HCA who was certified prior to the effective date of the legislation as a Medical Assistant-Phlebotomist. ■

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*This article has been prepared by Emily R. Studebaker of Garvey Schubert Barer. It is not a substitute for legal advice or individual analysis of a particular legal matter. Transmission and receipt of this article does not create an attorney-client relationship.*

**Table 1: Summary of Qualifications for Certification and Registration and the Scope of Practice for Medical Assistants**

|                       | Certified Medical Assistant                                                                                                                                                                                                                         | Medical Assistant-Registered                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Medical Assistant-Hemodialysis Technician                                                                                                                 | Medical Assistant-Phlebotomist                                                                                                                                                                                    |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Definition</b>     | A person certified under the MA law who assists a health care practitioner with patient care, executes administrative and clinical procedures, and performs any of the functions listed below under the supervision of the health care practitioner | A person registered under the MA law who, pursuant to an endorsement by a health care practitioner, clinic, or group practice, assists a health care practitioner with patient care, executes administrative and clinical procedures, and performs functions below under the supervision of the health care practitioner                                                                                                                                                                                                                                                                                                                                                        | A person certified under the MA law who performs hemodialysis and any of the functions listed below under the supervision of the health care practitioner | A person certified under the bill who performs capillary, venous, and arterial invasive procedures for blood withdrawal and any of the functions listed below under the supervision of a health care practitioner |
| <b>Qualifications</b> | <ul style="list-style-type: none"> <li>• Complete training approved by DOH</li> <li>• Pass examination approved by DOH</li> <li>• Meet qualifications established by DOH in rule</li> </ul>                                                         | <ul style="list-style-type: none"> <li>• Obtain endorsement by health care practitioner clinic, or group practice</li> <li>• Obtain attestation from the practitioner, clinic, or practice specifying the medical tasks that may be performed</li> </ul> <p>An applicant for registration as a Medical Assistant-Registered who applies to DOH within seven days of employment by the endorsing health care practitioner, clinic, or group practice may work as a medical assistant-registered for up to 60 days while the application is processed. The applicant must stop working on the 60th day of employment if the registration has not been granted for any reason.</p> | <ul style="list-style-type: none"> <li>• Meet qualifications established by DOH in rule</li> </ul>                                                        | <ul style="list-style-type: none"> <li>• Meet qualifications established by DOH in rule</li> </ul>                                                                                                                |

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|                                                         | Certified Medical Assistant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Medical Assistant-Registered                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Medical Assistant-Hemodialysis Technician                                                                                                                            | Medical Assistant-Phlebotomist                                                                                                                                                                  |
|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Transferable between Different Practice Settings</b> | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Yes                                                                                                                                                                  | Yes                                                                                                                                                                                             |
| <b>Scope of Practice</b>                                | <p>Fundamental procedures:</p> <ul style="list-style-type: none"> <li>Wrapping items for autoclaving</li> <li>Sterilization procedures</li> <li>Disposing of biohazardous materials</li> <li>Practicing standard precautions</li> </ul> <p>Clinical procedures:</p> <ul style="list-style-type: none"> <li>Performing aseptic procedures</li> <li>Preparing of and assisting in sterile procedures</li> <li>Taking vital signs</li> <li>Preparing patients for examination</li> <li>Capillary blood withdrawal, venipuncture, and intradermal, subcutaneous, and intramuscular injections</li> <li>Observing and reporting patients' signs or symptoms</li> </ul> <p>Specimen collection:</p> <ul style="list-style-type: none"> <li>Capillary puncture and venipuncture</li> <li>Obtaining specimens for microbiological testing</li> </ul> | <p>Only those tasks listed in MA's current attestation or endorsement</p> <p>Fundamental procedures:</p> <ul style="list-style-type: none"> <li>Wrapping items for autoclaving</li> <li>Sterilization procedures</li> <li>Disposing of biohazardous materials</li> <li>Practicing standard precautions</li> </ul> <p>Clinical procedures:</p> <ul style="list-style-type: none"> <li>Preparing for sterile procedures</li> <li>Taking vital signs</li> <li>Preparing patients for examination</li> <li>Observing and reporting patients' signs or symptoms</li> </ul> <p>Specimen collection:</p> <ul style="list-style-type: none"> <li>Obtaining specimens for microbiological testing</li> <li>Instructing patients in proper technique to collect urine and fecal specimens</li> </ul> | <ul style="list-style-type: none"> <li>Perform hemodialysis</li> <li>Administer vaccines, drugs, and oxygen to a patient pursuant to rules adopted by DOH</li> </ul> | <ul style="list-style-type: none"> <li>Perform capillary, venous, or arterial invasive procedures for blood withdrawal</li> <li>Administer vaccines pursuant to rules adopted by DOH</li> </ul> |

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|  | Certified Medical Assistant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Medical Assistant-Registered                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Medical Assistant-Hemodialysis Technician | Medical Assistant-Phlebotomist |
|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|--------------------------------|
|  | <ul style="list-style-type: none"> <li>• Instructing patients in proper technique to collect urine and fecal specimens</li> </ul> <p>Diagnostic testing:</p> <ul style="list-style-type: none"> <li>• Electrocardiography</li> <li>• Respiratory testing</li> <li>• Tests waived under the federal clinical laboratory improvement amendments program on the effective date of this section</li> <li>• Moderate complexity tests if the medical assistant-certified meets standards for personnel qualifications and responsibilities in compliance with federal regulation for non-waived testing.</li> </ul> <p>Patient care:</p> <ul style="list-style-type: none"> <li>• Telephone and in-person screening limited to intake</li> <li>• and gathering of information without requiring the exercise</li> <li>• of judgment based on medical knowledge</li> <li>• Obtaining vital signs</li> <li>• Obtaining and recording patient history</li> <li>• Preparing and maintaining examination and treatment</li> </ul> | <p>Patient care:</p> <ul style="list-style-type: none"> <li>• Telephone and in-person screening limited to intake and gathering of information without requiring the exercise of judgment based on medical knowledge</li> <li>• Obtaining vital signs</li> <li>• Obtaining and recording patient history</li> <li>• Preparing and maintaining examination and treatment areas</li> <li>• Maintaining medication and immunization records</li> <li>• Screening and following up on test results</li> <li>• Preparing patients for, and assisting with, routine and specialty examinations, procedures, treatments, and minor office surgeries utilizing no more than local anesthetic.</li> <li>• Tests waived under the federal clinical laboratory improvement amendments program on July 1, 2013.</li> <li>• Moderate complexity tests if the medical assistant-registered meets standards for</li> </ul> |                                           |                                |

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|  | Certified Medical Assistant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Medical Assistant-Registered                                                                                                                                                                                                                                                                                                                   | Medical Assistant-Hemodialysis Technician | Medical Assistant-Phlebotomist |
|--|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|--------------------------------|
|  | <ul style="list-style-type: none"> <li>• areas</li> <li>• Preparing patients for, and assisting with, routine and specialty examinations, procedures, treatments, and minor office surgeries</li> <li>• Maintaining medication and immunization records</li> <li>• Screening and following up on test results</li> </ul> <p>Administering medications only if the drugs are:</p> <ul style="list-style-type: none"> <li>• Administered only by unit or single dosage, or by a dosage calculated by a health care practitioner (a combination or multi-dose vaccine is considered a unit dose);</li> <li>• Limited to legend drugs, vaccines, and Schedule III-V controlled substances;</li> <li>• Administered pursuant to a written order from a health care practitioner; <u>and</u></li> <li>• Not experimental drugs or chemotherapy drugs.</li> </ul> <p>Administering intravenous injections if injections are:</p> <ul style="list-style-type: none"> <li>• For diagnostic or therapeutic agents; <u>and</u></li> </ul> | <p>personnel qualifications and responsibilities in compliance with federal regulation for non-waived testing.</p> <ul style="list-style-type: none"> <li>• Administering eye drops, topical ointments, and vaccines, including combination or multi-dose vaccines.</li> <li>• Urethral catheterization when appropriately trained.</li> </ul> |                                           |                                |

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|  | Certified Medical Assistant                                                                                                                                                                                                                                                  | Medical Assistant-Registered | Medical Assistant-Hemodialysis Technician | Medical Assistant-Phlebotomist |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-------------------------------------------|--------------------------------|
|  | <ul style="list-style-type: none"> <li>Under the direct visual supervision of a health care practitioner</li> </ul> <p>Urethral catheterization when appropriately trained.</p> <p>The list of medications that may be administered is subject to limitation by the DOH.</p> |                              |                                           |                                |