

**DEPARTMENT OF HEALTH SERVICES  
PUBLIC HEALTH SERVICES  
BUREAU OF EMERGENCY MEDICAL SERVICES  
#SP-078-PHS-EMS**

**INTERPRETATION OF HOW SCOPE OF PRACTICE APPLIES TO A STUDENT ENROLLED  
IN A COURSE**

*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 § 41-1033 for a review of the statement.*

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The purpose of this substantive policy statement is to notify the public how the Arizona Department of Health Services (Department) interprets requirements related to certification and scope of practice as applied to a student enrolled in a course.

Arizona Administrative Code (A.A.C.) R9-25-401(A) provides that “an individual shall not act as an EMCT unless the individual has current certification or recertification from the Department.” A.A.C. R9-25-502(A) states that an “EMCT shall perform a medical treatment, procedure, or technique or administer a medication only [i]f the skill is within the EMCT’s scope of practice skills.” The rules in 9 A.A.C. 25 do not address whether or how these requirements apply to a student enrolled in a course, as defined in A.A.C. R9-25-101.

The Department believes that it is essential that each student enrolled in a course that includes requirements for clinical training and/or field training, as defined in A.A.C. R9-25-101, be able to complete those requirements to attain the competencies necessary to succeed. A.A.C. R9-25-304(A)(5) contains requirements for supervision by a qualified preceptor during clinical training and field training, which provide the necessary safeguards to ensure that public health and safety are not compromised during clinical training and field training. A student who is enrolled in a course that includes clinical training or field training may or may not be currently certified by the Department as an EMCT, and is expected to learn and practice new skills that are within the scope of practice for a level of EMCT for which the student most likely does not have certification. However, these new skills are required to be within the scope of practice of the supervising preceptor, and the Department expects the preceptor to accept responsibility for the student’s performance of these new skills. Thus, the student is not acting in the capacity of a certified EMCT while practicing these new skills during clinical training and field training.

In light of this, the Department interprets requirements related to certification in A.A.C. R9-25-401(A) and scope of practice in A.A.C. R9-25-502(B) to not apply to a student enrolled in a course, as defined in A.A.C. R9-25-101, while the student is participating in clinical training and field training under the supervision of a qualified preceptor as required under A.A.C. R9-25-304.