



**COLORADO**  
Department of Public  
Health & Environment

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## Tuberculosis Program

### Memorandum

**To:** All Colorado Local Health Departments and Jurisdictions-Tuberculosis  
**From:** CDPHE-Tuberculosis Program  
**Date:** 03/21/17  
**Re:** Scope of Practice Guidelines for Tuberculosis

Attached is a newly developed form which helps illustrate the defined scope of practice for specific disciplines related to tuberculosis testing and management. This form was created in response to questions we receive on a daily basis regarding who can or cannot place and read a skin test. Because of this, we have worked with the State Board of Nursing, the Colorado Department of Regulatory Agencies (DORA), and the American Association of Medical Assistants to ensure we fully understood the limitations of each practice. The accompanying document is the result of this investigation, and will be uploaded onto our TB Program webpage, <https://www.colorado.gov/cdphe/tuberculosis>

This document does not constitute legal advice, nor does it guarantee immunity from liability for acts that are determined to be outside of an individual's scope of practice. If a health care practitioner has questions concerning their actions and scope of practice requirements, the practitioner should consult with DORA and/or an attorney as appropriate.

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## Scope of Practice Guidelines Related to Tuberculosis

Discipline	Order Tuberculin Skin Test (TST)	Place TST	Measure Induration of TST	Assessment/ Interpretation of TST <sup>2</sup>	Provide Patient Education	Case Management/ Assessments <sup>4</sup>	DOT / DOPT (see note# 5 below for definitions)
Certified Nursing Assistant (CNA)	No	No	No	No	No	No	Yes <sup>5</sup>
Medical Assistant (MA)	No	Yes <sup>1</sup>	Yes <sup>1</sup>	No	No	No	Yes <sup>5</sup>
Licensed Practical Nurse (LPN)	No	Yes	Yes	No	No <sup>3</sup>	No	Yes <sup>5</sup>
Registered Nurse (RN)	Yes <sup>6</sup>	Yes	Yes	Yes	Yes	Yes	Yes <sup>5</sup>

1 Under direct supervision of a delegating/supervising/overseeing physician

“Direct supervision” is usually defined as the delegating/supervising/overseeing physician(s) being on the premises and reasonably available (although not necessarily in the same room) when medical assistants are undertaking clinical duties other than the most basic tasks, such as taking vital signs and collecting certain specimens (e.g., urine and sputum).

2 Assessment/Interpretation is determining if induration indicates positive or negative result as well as next steps.

3 Initial education is performed by registered nurse. An LPN can and may reinforce education which has been already provided by an RN.

4 Anything which requires the discipline to exercise independent professional judgment or to make clinical assessments, evaluations, or interpretations.

5 Directly-observed therapy (DOT) and directly-observed preventive therapy (DOPT) are tasks that can be delegated to appropriately trained personnel; however, the registered nurse remains responsible for patient care and medication administration.

6 Registered Nurses may perform the following functions within their training specialty area and consistent with their experience and credentialing: assessment, management, and treatment of episodic illnesses, chronic illness, contraception, and the common nursing functions of health promotion, and general evaluation of health status (including but not limited to ordering laboratory procedures, x-rays, and physical therapies, recommending diets, and referring to Specialty Clinics when indicated). CDPHE-TB Program’s recommendation is to reference your facility’s procedures and protocols related to ordering as each facility may differ.

### References:

Colorado Department of Regulatory agencies, Board of Nursing. <https://www.colorado.gov/pacific/dora/Nursing>

Balasa DA. Medical assistants: Scope of practice, education, and credentialing. American Association of Medical Assistants, CMA Today

May/June 2013 (Issue 3/Volume 46). <http://www.aama-ntl.org/cma-today/archives/article?id=281dd24a-4840-6a90-a81c-ff00003b2c18#.WKSBINrKpo>

Department of Regulatory Agencies, Division of Professions and Occupations - Board of Nursing 3 CCR 716-1.

<https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=6775&fileName=3%20CCR%20716-1>