

ORDERING AND COUNTERSIGNATURE REQUIREMENTS FOR MIDDLE LEVEL PROVIDERS¹

Test	APNP ²	Advanced Practice Nurse ³	Nurse Midwife ⁴	PA
Lab				
May midlevel provider order the test?	<p>APNP may order lab tests to promote case management. Physician collaboration⁵ is required, but no physician countersignature is necessary. N 8.10(6)</p> <p>HFS 124.17 requires that the order must come from a physician or other individual authorized by the medical staff to order tests.</p>	<p>APNs who are not APNPs may write orders as a delegated medical act. A physician must first have issued protocols or written or verbal orders regarding the order. An APN may only accept those delegated medical acts he or she is competent to perform based on his or her nursing education, training and experience. To write an order, the APN must be under the general supervision of the physician. Countersignature of the patient's medical record is required to document appropriate supervision of the APN and demonstrate physician responsibility for the patient's care.</p> <p>HFS 124.17 requirement also applies.</p>	Same as for APNP.	<p>Yes, per Med 8.07(2)(b), but PA's entire practice must be under physician supervision. Countersignature of the patient's medical record is required to document appropriate supervision of the PA and demonstrate physician responsibility for the patient's care.</p> <p>HFS 124.17 requirement also applies.</p>
Physical Therapy				
May midlevel provider order the test?	<p>Yes, as a delegated medical act after a physician, dentist or podiatrist has previously diagnosed the condition requiring therapy, but only if allied health staff are allowed to order physical therapy under the medical staff bylaws. HFS 124.21.</p> <p>Countersignature is required.</p>	Same as for APNP.	Same as for APNP.	Same as for NP.

¹ This chart generally discusses a midlevel provider's scope of practice under state law for ordering diagnostic tests.

² In Wisconsin, an advanced practice nurse prescriber is an advanced practice nurse who has been granted a certificate by the State of Wisconsin to issue prescription orders.

³ In Wisconsin, an advanced practice nurse is a licensed RN who is certified by a national certifying body approved by the Board of Nursing as a Nurse Practitioner ("NP"), Certified Nurse Specialist ("CNS"), Certified Registered Nurse Anesthetist ("CRNA") or certified nurse midwife. N 8.02(1).

⁴ In Wisconsin, nurse midwife is an advanced practice nurse who has been granted a license to engage in the practice of nurse-midwifery in Wisconsin.

⁵ Collaboration is defined as a process which involves two or more health care professionals (at least one physician) working together, in each other's presence when necessary, each contributing one's respective area of expertise to provide more comprehensive care than one alone can offer. N 8.02(5).

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Respiratory Therapy				
May midlevel provider order the test?	No. HFS 124.22(4) requires a physician order.	Same as for APNP.	Same as for APNP.	Same as for NP.
X-ray and Electrocardiogram (EKG)				
May midlevel provider order the test?	APNP may order x-rays to promote case management. Physician collaboration is required, but no physician countersignature is necessary. N 8.10(6) HFS 124.18 requires that the order must come from a physician or other individual authorized by the medical staff to order x-rays.	APNs who are not APNPs may write orders as a delegated medical act, as described under the lab section. Countersignature of the patient's medical record is required to document appropriate supervision of the APN and demonstrate physician responsibility for the patient's care. HFS 124.18 requirement also applies.	Same as for APNP.	Yes, per Med 8.07(2)(b), but PA's entire practice must be under physician supervision. Countersignature of the patient's medical record is required to document appropriate supervision of the PA and demonstrate physician responsibility for the patient's care. HFS 124.18 requirement also applies.
Drugs				
May midlevel provider order the test?	Yes, if the nurse has been certified as an APNP and the nurse collaborates with a physician. No counter-signature is required. N 8.06.	If not an APNP, then order may be as a delegated medical act as described in the lab section. Countersignature is required.	Same as for NP.	Yes, if in accordance with written guidelines and under physician supervision. Med 8.08. Physician countersignature is required on prescription order.
Occupational Therapy				
May midlevel provider order the test?	No. Med 19.08(2) requires a physician referral for evaluation and rehabilitative treatment.	Same as for APNP.	Same as for APNP.	Same as for NP.