

SUPERVISION of PHYSICIAN ASSISTANTS

Changes to the law have made it easier for a physician to work with a physician assistant (PA). Medical Board approval to supervise a PA is no longer necessary and some of the duties and responsibilities of supervising a PA have changed.

Supervisory Requirements

Listed below are some of the PA supervisory requirements:

- According to California law, all care provided to a patient by a physician assistant is the ultimate responsibility of the supervising physician.
- Current law allows a physician to supervise no more than four physician assistants (PAs) at any moment in time.
- According to regulations, the physician must be in the same facility with the PA or be immediately available by electronic communications.
- Before authorizing a PA to perform any medical procedure, the physician is responsible for evaluating the PA's education, experience, knowledge, and ability to perform the procedure safely and competently. In addition, the physician should verify that a PA has a current California license issued by the Physician Assistant Board (Board website: www.pac.ca.gov)
- PAs may not own a medical practice. (Please see Section 13400 and following of the Corporations Code.)
- PAs may not hire their supervisors. PAs are dependent practitioners who act as agents on behalf of a supervising physician.

Physicians who plan to supervise PAs should carefully review Business and Professions Code section 3502 and 3502.1 and Section 1399.545 of Title 16 of the California Code of Regulations for a complete listing of supervision requirements available on the Board website www.pac.ca.gov.

There are four methods for providing supervision of a physician assistant.

1. The physician sees the patients the same day that they are treated by the PA.
2. The physician reviews, signs and dates the medical record of every patient treated by the physician assistant within thirty days of the treatment.
3. The physician adopts written protocols, which specifically guide the actions of the PA. The physician must select, review, countersign and date a sample, consisting of, at a minimum, 5 percent of the medical records of patients treated by the physician assistant functioning under the protocols within 30 days of the date of treatment by the physician assistant.
4. Or, in special circumstances, the physician provides supervision through additional methods approved in advance by the Board.

To fulfill the required supervisor obligation, the physician must utilize one or a combination of the four authorized supervision methods.

Delegation of Services Agreement

For the mutual benefit and protection of patients, physicians and their PAs, the PA regulations require the physician to delegate in writing, for each supervised physician assistant, those medical services which the PA may provide. That document is often referred to as a Delegation of Services Agreement. A sample is available on the Board website www.pac.ca.gov. Medical tasks, which are delegated by a supervising physician, may only be those that are usual and customary to the physician's practice.

Drug Orders

- Pharmacy Law (Business and Professions Code Section 4000 et seq.) authorizes licensed pharmacists to dispense drugs or devices based on a PA's "drug order". Current law also allow PAs to obtain their own DEA numbers for use when writing prescription drug orders for controlled substances.
- Current law permits physician assistants to write and sign prescription drug orders when authorized to do so by their supervising physicians for Schedule II-V medication.
- A PA may only administer, provide, or transmit a drug order for Schedule II through Schedule V controlled substances with the advance approval by a supervising physician for a specific patient unless a physician assistant completes an approved education course in controlled substances, and if delegated by the supervising physician. If a physician assistant chooses not to take the educational course, the requirements for patient-specific authority remain unchanged.
- In order to ensure that a PA's actions involving the prescribing, administration or dispensing of drugs is in strict accordance with the directions of the physician, every time a PA administers or dispenses a drug or transmits a Schedule II drug order, the physician supervisor must sign and date the patient's medical record or drug chart within seven days.

All physician assistants and supervising physicians should familiarize themselves with all physician assistant laws and regulations to ensure they are in compliance with the physician assistant laws and regulations.

For physicians who are interested in utilizing physician assistants and would like to know more about the benefits and requirements of using physician assistants, several publications are available from the Board, including:
Physician Assistant Laws and Regulations
Sample Delegation of Services Agreement
Drug Orders by Physician Assistants (information bulletin)
What is a PA? (Patient information brochure -English & Spanish)

To request publications or to verify physician assistant licensing information, contact:

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This article has highlighted many of the key responsibilities a physician assumes when approved to utilize physician assistants. It does not cover all the requirements of law. This is not a declaratory opinion of the Physician Assistant Board or the Medical Board of California.