

State Board of Osteopathic Medicine
Special Notice
December 15, 2016 (Update)

**Board Approves Reduction in Paperwork and Reporting Requirements
for Substitute Supervising Physicians of the Physician Assistants**

At its meeting on December 14, 2016, the State Board of Osteopathic Medicine approved a reduction in paperwork and reporting requirements for substitute supervising physicians. Effective immediately, the "Written Agreement Change Form" for Adding/Deleting a Substitute Supervisor will no longer be required to be filed with the Board office.

However, the "Written Agreement Change Form" **is required and must be submitted** to:

- Delete a Physician Assistant;
- Dissolve a Written Agreement;
- Make Changes in Protocol, including: changing the job duties of the Physician Assistant;
- Changing the Physician Assistant's prescribing or dispensing privileges;
- Changing the practice address (only if changing a hospital/surgical center practice location)

Temporary Authorization for Physician Assistants to Practice Pending Board Approval

Act 101 of 2013 approved a temporary authorization for Physician Assistants to practice pending formal approval of the "Application for Registration as a Supervising Physician."

Upon submission of the application, Board staff will review the application ONLY for completeness and issue a letter to the supervising physician providing the temporary authorization for the physician assistant to begin practice. If the application is not "complete" (i.e., required signatures are not provided, information is missing, fee is not included, etc.), a temporary authorization for the physician assistant to begin practicing **WILL NOT** be issued.

The temporary authorization, when issued, will provide a period of 120 days during which the physician assistant may practice, under the terms set forth in the written agreement as submitted to the Board. **While practicing under the temporary authorization, the supervising physician shall countersign 100% of the patient records completed by the physician assistant within a reasonable time, which shall not exceed ten days.** Within 120 days, the Board will notify the supervising physician of the final approval or disapproval of the application. If approved, a final approval of the written agreement will be issued to the Supervising Physician. **If there are discrepancies that have not been corrected within the 120 day period, the temporary authorization to practice will expire.**

PLEASE NOTE: The primary supervisor's responsibilities include:

- Providing a copy of the final, Board approved written agreement to all substitute supervisors.
- Maintaining a current list of all locations where the physician assistant will perform duties.
- Maintaining a current list of all substitute supervisors under which the physician assistant will work.
- Notifying the Board of changes to the primary practice location utilizing a written agreement change form.
- Ensuring that the physician assistant will not practice without supervision by either the primary supervisor or an authorized substitute supervisor.

Changes in Patient Record Review

The State Board of Osteopathic Medicine is implementing changes to effectuate Act 101 of 2013 (related to physician requirements for countersigning patient records completed by a physician assistant). Physicians who currently have a written agreement with a physician assistant, and who wish to change their current countersigning practice, must submit a written agreement change form and have the change approved by the Board. Physicians who are entering into new a written agreement will see the statutory amendment reflected in the new application form.

Prior to the enactment of Act 101 of 2013, a supervising physician was required to countersign 100% of the patient records completed by the physician assistant within a reasonable time, not to exceed ten days. Under the new rules, 100% countersignature within 10 days will be required only during each of the following time periods:

- The first 12 months of the physician assistant's practice post graduation and after obtaining licensure.
- The first 12 months of the physician assistant's practice in a new specialty.
- The first 6 months of the physician assistant's practice in the same specialty under a new primary supervisor (unless, the new primary supervisor was registered as a substitute supervisor for at least six months under another written agreement).

If after the required time frames listed above, the supervising physician wishes to deviate from the 100% chart review, the supervising physician must complete and submit a written agreement change form, including specific details regarding how patient records will be selected for review and how often patient records will be reviewed.

This information should include specifics such as type or percentage of patient charts that will be reviewed, specific types or categories of patient cases that will be reviewed, the review schedule, etc. In addition, the supervising physician must affirm that the review plan is sufficient to assure adequate review of the physician assistant's practice.

Deviation from 100% review of patient records within 10 days will require Board approval.

The supervising physician will need to continue to perform 100% review of patient records within 10 days until the Board approves the amended written agreement.

The written agreement change form can be found on the Board's website at www.dos.pa.gov/ost within the list of Board applications.