

Physician Assistant Countersignature Requirements

| | STATE BOARD OF MEDICINE | STATE BOARD OF OSTEOPATHIC MEDICINE |
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| RELEVANT LAW | <p>Prior to the enactment of Act 100 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:</p> <ul style="list-style-type: none"> • 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 6 months under another written agreement. <p>If after the required time frame 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. 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.</p> <p>Act 100 of 2013 (House Bill 1348) http://www.legis.state.pa.us/cfdocs/billInfo/billInfo.cfm?sYear=2013&sInd=0&body=H&type=B&bn=1348</p> | <p>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:</p> <ul style="list-style-type: none"> • 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 6 months under another written agreement. <p>If after the required time frame 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. 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.</p> <p>Act 101 of 2013 (House Bill 1351) http://www.legis.state.pa.us/cfdocs/billInfo/billInfo.cfm?sYear=2013&sInd=0&body=H&type=B&bn=1351</p> |



Physician Assistant Countersignature Requirements, continued

| REQUIREMENT | STATE BOARD OF MEDICINE | STATE BOARD OF OSTEOPATHIC MEDICINE |
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| <p>Countersignature in a facility setting</p> | <p>Countersignature requirements in a facility are also under the jurisdiction of the facility bylaws, the Pennsylvania Department of Health’s Health Care Facility Act and The Joint Commission.</p> <p>The Department of Health (DOH) interpretation of the regulation at 28 PA Code § 107.12a (d)(2)(iii) is that it permits physician assistants to write orders and record reports and progress notes in medical records within the limits established by the medical staff. DOH has determined that the hospital licensure regulations reference the scope of practice in the Medical Practice Act and the Osteopathic Medical Practice Act, and any regulations promulgated under those Acts, therefore, any changes to the Medical and Osteopathic Medical Practice Acts or regulations are incorporated by reference in the hospital regulations.</p> <p>Joint Commission Standard RC.01.02.01 states: Entries in the medical record are authenticated. EP2. The hospital defines the types of entries in the medical record made by nonindependent practitioners that require countersigning, in accordance with law and regulation</p> | <p>Countersignature requirements in a facility are also under the jurisdiction of the facility bylaws, the Pennsylvania Department of Health’s Health Care Facility Act and The Joint Commission.</p> <p>The Department of Health (DOH) interpretation of the regulation at 28 PA Code § 107.12a (d)(2)(iii) is that it permits physician assistants to write orders and record reports and progress notes in medical records within the limits established by the medical staff. DOH has determined that the hospital licensure regulations reference the scope of practice in the Medical Practice Act and the Osteopathic Medical Practice Act, and any regulations promulgated under those Acts, therefore, any changes to the Medical and Osteopathic Medical Practice Acts or regulations are incorporated by reference in the hospital regulations.</p> <p>Joint Commission Standard RC.01.02.01 states: Entries in the medical record are authenticated. EP2. The hospital defines the types of entries in the medical record made by nonindependent practitioners that require countersigning, in accordance with law and regulation</p> |



Physician Assistant Countersignature Requirements, continued

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| PA chart countersignature requirements for a new PA graduate | The approved attending physician shall countersign 100% of the patient records completed by the physician assistant within a reasonable time, which shall not exceed ten days, during the first 12 months of the physician assistant's practice post-graduation and after the physician assistant has fulfilled the criteria for licensure. | The approved attending physician shall countersign 100% of the patient records completed by the physician assistant within a reasonable time, which shall not exceed ten days, during the first 12 months of the physician assistant's practice post-graduation and after the physician assistant has fulfilled the criteria for licensure. |
| PA chart countersignature requirements for a PA entering a new specialty | The approved attending physician shall countersign 100% of the patient records completed by the physician assistant within a reasonable time, which shall not exceed ten days, during the first 12 months of the physician assistant's practice in a new specialty in which the physician assistant is practicing. | The approved attending physician shall countersign 100% of the patient records completed by the physician assistant within a reasonable time, which shall not exceed ten days, during the first 12 months of the physician assistant's practice in a new specialty in which the physician assistant is practicing. |
| PA chart countersignature requirements for a PA entering a new practice setting in the same specialty | The approved attending physician shall countersign 100% of the patient records completed by the physician assistant within a reasonable time, which shall not exceed ten days, during the first six months of the physician assistant's practice in the same specialty under the supervision of the approved physician. | The approved attending physician shall countersign 100% of the patient records completed by the physician assistant within a reasonable time, which shall not exceed ten days, during the first six months of the physician assistant's practice in the same specialty under the supervision of the approved physician. |

Physician Assistant Countersignature Requirements, continued

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| <p>PA chart countersignature requirement for PA remaining in same practice setting when primary supervisor leaves and a previous substitute supervisor is assigned as a new primary supervisor if the PA has been in this setting for more than 6 months.</p> | <p>In this scenario, the strict 100% countersignature within 10 days rule does not apply. The new written agreement can reflect a lesser portion of PA charts requiring countersignature. A copy signed by the substitute physician of the previous written agreement showing a date 6 month prior to the submission of the new written agreement should be included with the new written agreement.</p> | <p>In this scenario, the strict 100% countersignature within 10 days rule does not apply. The new written agreement can reflect a lesser portion of PA charts requiring countersignature. A copy signed by the substitute physician of the previous written agreement showing a date 6 month prior to the submission of the new written agreement should be included with the new written agreement.</p> |
| <p>Required chart review for PAs not requiring countersignature</p> | <p>The requested number of charts to be reviewed should be an amount, over a generous time frame that reflects the acuity of the patient's conditions, the medical specialty of practice, the length of work experience of the PA and the confidence of the supervising physician. The number must be auditable and enforceable but not create undue hardship on the physician / PA team.</p> | <p>The requested number of charts to be reviewed should be an amount, over a generous time frame that reflects the acuity of the patient's conditions, the medical specialty of practice, the length of work experience of the PA and the confidence of the supervising physician. The number must be auditable and enforceable but not create undue hardship on the physician / PA team</p> |



Written Agreements

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| <p>Initial written agreement review</p> | <p>All sections need completed. Original signatures are required. Accurate dates are needed. Specific core privileges and specialty core privileges should be included. A cover letter outlining the specifics of your setting is encouraged to help expedite your request. The phrase “other duties as assigned” will result in a denied application. Exact payment must be included.</p> <p>The initial written agreement must include the number and frequency of the patient record reviews and the criteria for selecting patient records for review when 100% review is not required (detailed further in document.)</p> <p>For a new graduate PA in a new specialty or setting, countersignature must reflect the 100% requirement in 10 day rule for 6-12 months respectively. A written agreement change form will be required at the end of the 6-12 month time frame to revise this restriction for a new written agreement. Maintaining the 100% countersignature within 10 days is required until the written agreement change form has been approved by the Board.</p> | <p>All sections need completed. Original signatures are required. Accurate dates are needed. Specific core privileges and specialty core privileges should be included. A cover letter outlining the specifics of your setting is encouraged to help expedite your request. The phrase “other duties as assigned” will result in a denied application. Exact payment must be included.</p> <p>The initial written agreement must include the number and frequency of the patient record reviews and the criteria for selecting patient records for review when 100% review is not required (detailed further in document).</p> <p>For a new graduate, PA in a new specialty or setting, countersignature must reflect the 100% requirement in 10 day rule for 6-12 months respectively. A written agreement change form will be required at the end of the 6-12 month time frame to revise this restriction for a new written agreement. Maintaining the 100% countersignature within 10 days is required until the written agreement change form has been approved by the Board.</p> |



Written Agreements, continued

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| <p>Primary Supervising Physician’s Responsibilities</p> | <p>The primary supervising physician’s responsibilities include:</p> <ul style="list-style-type: none"> • 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. | <p>The primary supervising physician’s responsibilities include:</p> <ul style="list-style-type: none"> • 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. |
| <p>PA chart countersignature for initial written agreements</p> | <p>For initial written agreements, the appropriate 6-12 month requirement must be listed. At the completion of that time frame, a written agreement change form would need to be submitted. The 100% countersignature within 10 days rule would apply until the approval letter is received from the Board for the written agreement change form.</p> | <p>For initial written agreements, the appropriate 6-12 month requirement must be listed. At the completion of that time frame, a written agreement change form would need to be submitted. The 100% countersignature within 10 days rule would apply until the approval letter is received from the Board for the written agreement change form.</p> |

Written Agreements, continued

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| <p>PA chart countersignature for physician assistants that have been in their present agreement for greater than 6 months</p> | <p>The State Board of Medicine has posted the revised written agreement change form on their website at the following link:</p> <p>http://www.portal.state.pa.us/portal/server.pt/gateway/PTARGS_0_2_1272447_0_0_18/WITTEN%20AGREEMENT%20CHANGE%20FORM.pdf</p> <p>A Special Notice was published to describe how the new form should be completed. This Special Notice is available at the following link:</p> <p>http://www.portal.state.pa.us/portal/http://www.portal.state.pa.us:80/portal/server.pt/gateway/PTARGS_0_159777_1332130_0_0_18/Special%20Notice%20-%20Supervising%20Physician-Written%20Agreement%20Change%20Form%20Updates.pdf</p> | <p>The State Board of Osteopathic Medicine has posted the revised written agreement change form on their website at the following link:</p> <p>http://www.portal.state.pa.us/portal/server.pt/gateway/PTARGS_0_160484_487727_0_0_18/Change_Form_for_OSTEO_PAS.pdf</p> <p>A Special Notice was published to describe how the new form should be completed. This Special Notice is available at the following link:</p> <p>http://www.portal.state.pa.us/portal/http://www.portal.state.pa.us:80/portal/server.pt/gateway/PTARGS_0_159707_1396077_0_0_18/Special%20Notice%20-%20Supervising%20Physician%20and%20Written%20Agreement%20Change%20Form%20Updates%20-%20Osteo.pdf</p> |
| <p>When written agreement change form required</p> | <p>A written agreement change form must be submitted for the following:</p> <ul style="list-style-type: none"> • Dissolving a written agreement • Adding job duties • Deleting job duties • Changing prescribing/ dispensing privileges • Changing the primary practice address currently on file at the board • Adding/ deleting hospital practice location • Modification of the 100% countersignature within 10 days requirement | <p>A written agreement change form must be submitted for the following:</p> <ul style="list-style-type: none"> • Dissolving a written agreement • Adding / deleting a substitute supervising physician • Adding job duties • Deleting job duties • Changing prescribing/ dispensing privileges • Changing the primary practice address currently on file at the board • Adding/ deleting hospital practice location • Modification of the 100% countersignature within 10 days requirement |

Written Agreements, continued

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| <p>Substitute supervising physician list on written agreement</p> | <p>Effective April 2013, the State Board of Medicine only requires a single substitute supervising physician to be listed on the written agreement form. The primary supervisor is required to provide a copy of the approved written agreement to all substitute supervising physicians. The physician assistant is required by law to keep a copy of the original agreement signed by the primary as well as a copy of the version distributed to the substitute supervising physicians with their signatures.</p> | <p>The State Board of Osteopathic Medicine requires a minimum of two substitute supervising physicians' names on the original written agreement. A list of all substitute supervising physicians that the physician assistant will be working under must be included. The physician assistant is required by law to keep a copy of the approved written agreement at the practice setting.</p> |
| <p>Written agreement change form reviews</p> | <p>The board staff will review the written agreement change forms using broad guidelines. A letter of approval will be sent to the supervising physician or the request will be placed in front on the full State Board of Medicine for further review and discussion. The supervising physician will receive a letter regarding outcome of the board decision.</p> | <p>All written agreement change forms will be reviewed by the full State Board of Osteopathic Medicine in relation to revision of the 100% countersignature within 10 days modification requests.</p> |



Temporary Authorization to Practice

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| Temporary authorization to practice provision initial review | Upon submission of the application, board staff shall review the application only for completeness and shall issue a letter to the supervising physician providing the temporary authorization for the physician assistant to begin practice. | Upon submission of the application, board staff shall review the application only for completeness and shall issue a letter to the supervising physician providing the temporary authorization for the physician assistant to begin practice. |
| Temporary authorization to practice provision incomplete application | If the application is not complete, including, but not limited to, required information or signatures not being provided or the fee not being submitted, a temporary authorization for the physician assistant to begin practicing shall not be issued. | If the application is not complete, including, but not limited to, required information or signatures not being provided or the fee not being submitted, a temporary authorization for the physician assistant to begin practicing shall not be issued. |
| Temporary authorization to practice provision time frame | The temporary authorization, when issued, shall 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. Within 120 days the board shall notify the supervising physician of the final approval or disapproval of the application. If approved, a final approval of the written agreement shall be issued to the supervising physician. | The temporary authorization, when issued, shall 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. Within 120 days the board shall notify the supervising physician of the final approval or disapproval of the application. If approved, a final approval of the written agreement shall be issued to the supervising physician. |
| Temporary authorization to practice provision failure to resolve discrepancies in 120 days | If there are discrepancies that have not been corrected within the 120-day period, the temporary authorization to practice shall expire. A new application will need to be submitted for review and the PA will need to cease working until the new temporary authorization to practice permit is issued. | If there are discrepancies that have not been corrected within the 120- day period, the temporary authorization to practice shall expire. A new application will need to be submitted for review and the PA will need to cease working until the new temporary authorization to practice permit is issued. |

