

 <p style="text-align: center;">County of Sacramento Department of Health and Human Services Division of Behavioral Health Services Policy and Procedure</p>	Policy Issuer (Unit/Program)	QM
	Policy Number	QM-03-09
	Effective Date	07-01-2006
	Revision Date	09-01-2016
Title: Physician Assistant	Functional Area: Beneficiary Protection	
Approved By: (Signature on File) Signed version available upon request Alexandra Rechs, LMFT Program Manager, Quality Management Robert Hales, MD Medical Director, Division of Behavioral Health Services		

BACKGROUND/CONTEXT:

The Sacramento County Division of Behavioral Health Services and the Mental Health Plan (MHP) is responsible for assuring that the mental health services provided are commensurate with the scope of practice, training and experience of the staff utilized. The MHP, through the oversight of Quality Management (QM), must certify all staff that provides mental health services in accordance with California Code of Regulations (CCR), Welfare and Institution Code, and Business and Profession Code regulations.

DEFINITIONS:

Physician Assistant is a person who has completed a physician assistant program, approved by the Physician Assistant Committee, and is licensed by the Division of Licensing of the Medical Board of California. The Physician Assistant acts on behalf of and as an agent for the supervising physician and surgeon.

Supervising Physician is a physician and surgeon licensed by the California Medical Board who is responsible for overseeing the activities, and accepts responsibility for, the medical services rendered by the physician assistant.

Delegation of Services Agreement is a written practice agreement provided by the supervising physician specifying those medical services, including a drug formulary, which the Physician Assistant may provide. Medical tasks, which are delegated by a supervising physician, may only be those that are usual and customary to the physician's personal practice.

PURPOSE:

The purpose of this policy and procedure is to establish guidelines for the development of written procedures and protocols for the Physician Assistant (PA) as it relates to the practice of medicine. The guidelines will establish the scope of practice for the delivery of mental health services by the PA, for all County-operated and contracted providers.

DETAILS:

Policy:

It is the Policy of the MHP to require that each supervising physician develop written standardized procedures and protocols for the scope of practice for the Licensed Physician Assistant (PA).

Procedure:

- I. Requirements for Physician Assistant
 - A. Education
 1. The Physician Assistant must complete a physician assistant program, approved by the Physician Assistant Committee.
 - B. Licensure
 1. The Physician Assistant must be licensed by the Committee under the name of the Medical Board of California.
 2. Drug Enforcement Administration (DEA) is required, if specific training permits the PA to prescribe Schedule II-V.
- II. PA Scope of Practice
 - A. Guidelines
 1. A PA may only provide those medical services which:
 - a. He or she is competent to perform, as determined by the supervising physician.
 - b. Consistent with his/her education, training, and experience.
 - c. Delegated in writing by the supervising physician responsible for the clients cared for by the PA.
 - B. Development

The PA regulations require the supervising physician to delegate in writing, those medical services which the PA may provide.

 1. Practice protocols define the delegated services in accordance with California Code of Regulations Title 16. §1399.541.
 2. Practice Specific Formulary and Protocols.
 - a. Specifies all criteria for use of a particular drug or device.
 - b. Specifies any contraindication.
 - c. Drugs appropriate for use in the type of practice engaged in by the supervising physician.
 - d. Drug quantity limitation consistent with customary medical practice in the supervising physician's practice.
 3. Practice agreement signed and dated by the PA and supervising physician.
 - C. Drug Orders
 1. PA's may prescribe medications based on the specific formulary and protocols defined by the supervising physician.
 - a. Non-formulary medications may be issued with authorization by the supervising physician. (document oral authorization in the client's medical record)
 2. PA may, at the direction of the supervising physician, hand a client a properly labeled prescription drug prepackaged by a physician, manufacturer or a pharmacist.
 - a. Sample medications.
 3. PA may administer, provide or transmit drug orders for Scheduled II thru V controlled substances, if authorized in advance by the supervising physician, for a specific client unless specific training is completed and approved by the Board of Physician Assistants and specified in the practice agreement.
 - a. DEA License is required
 - b. Co-signature of the supervising physician must be documented in the client's medical record within seven days for Schedule II drugs.

4. PA may sign for the request and receipt of sample medications as specified in the practice agreement.

III. Supervising Psychiatrist Responsibilities

- A. May not supervise more than four (4) PAs at one time.
- B. Verify the Physician Assistant License and Training.
- C. Develop and evaluate annually the PA Delegation of Service Agreement.
- D. May delegate to a PA only those tasks and procedures consistent with the supervising physician's specialty.
- E. Establish an initial and ongoing mechanism to monitor the PA competence to manage clients utilizing one or more of the following methods.
 1. Physician sees the client the same day as they are treated by PA.
 2. Physician reviews, signs, dates the medical record of every patient treated by the PA within thirty days (30) of treatment.
 3. Physician adopts protocols and reviews five (5%) percent of medical records of clients treated by PA within thirty days (30) of treatment by the PA.
 4. In special circumstances, the physician provides supervision through additional methods approved in advance by the Board of Physician Assistants.
- F. Be available, in the same facility with the PA or be immediately available by electronic communications, unless a payor requirement specifies that the MD must be available on site.
- G. Provide continuing responsibility for following the progress of the clients in the care of the PA and ensure that the PA does not function autonomously.
- H. Ensure that the PA clients are seen, by the supervising physician, for a face-to-face contact, at least annually.

IV. County Mental Health Plan Standards

A. PA Staff Registration/Privileges

The PA will be afforded all the rights and privileges of a Licensed Practitioner of the Healing Arts (LPHA).

1. The PA will submit a Staff Registration Application Form per protocol with a copy of the following:
 - a. PA license
 - b. DEA license, if applicable
 - c. NPI number
2. The PA will submit a copy of the signed "Delegation of Service Agreement", detailing the PA scope of practice.
3. All new clients will be seen for the initial medication evaluation and diagnosis by a psychiatrist. This requirement may be waived by the supervising psychiatrist if the PA has 5 or more years experience in a community mental health setting.
4. PA may complete the annual Medication Service Plan with the co-signature of the supervising psychiatrist and provide follow-up medication support visits.
5. The Psychiatrist will document, in the medical record, the level of consultation with the PA.

B. Additional Requirements:

- a. An PA must be supervised by a psychiatrist employed by the same Contracted Provider or County Operated Program.
- b. The Contracted Provider or County Operated Program must have at least two (2) psychiatrists on staff.

- c. The Contracted Provider or County Operated Program must have a designated Medical Director.

REFERENCE(S)/ATTACHMENTS:

- California Code of Regulations, Title 16, Division 13.8, Title 9, 1840.346
- Business and Professions Code 3500-3546
- Health and Safety Code, Section 1250, 11055, 11056
- Code of Federal Regulations, Title 21, Section 1306.02

RELATED POLICIES:

- Staff Registration
- Dispensing “Sample” Medications

DISTRIBUTION:

Enter X	DL Name	Enter X	DL Name
X	Mental Health Staff		
X	Mental Health Treatment Center		
X	Adult Contract Providers		
X	Children’s Contract Providers		
X	Alcohol and Drug Services		
	Specific grant/specialty resource		

CONTACT INFORMATION:

- Quality Management Information
QMInformation@SacCounty.net