



State of California
 Medical Board of California
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Memorandum

Date: December 31, 2012
 To: Board Members
 From: Kevin A. Schunke
 Staff Liaison to the Physician Assistant Board
 Subject: Service by Physician Assistants; Delegated Service Agreements

At the October, 2012, Medical Board meeting, questions were asked about physician assistants (PAs): professional activities between graduation from a PA program and licensure, and the requirement of a delegated service agreement (DSA).

Following that meeting, Board staff met with staff and legal counsel from the Physician Assistant Committee (PAC), now the Physician Assistant Board, and were able to determine the following information.

For physicians after graduation from medical school, there is a period during which the person remains unlicensed and must complete some postgraduate training before being eligible for licensure. Depending on whether a person is a graduate of a medical school in the US/Canada (US/CAN), or if the person is an international medical graduate (IMG), the graduate is allowed to practice medicine without a license for up to 24 months (US/CAN) or for up to 36 months (IMGs) so long as the person is enrolled in an approved postgraduate training program.

A similar interim period of unlicensed service does not exist for PAs. Once a PA has graduated from the education program, the person cannot work as a PA until the license is issued. There is no mandatory postgraduate training period that is a pre-requisite to licensure. Once a PA has graduated and is licensed, the PA can go work in the "real world" or can pursue an optional postgraduate training program that is a furthering of professional development. Any professional service offered by a PA can only be accomplished via a DSA with a supervising physician(s).

Following are a series of questions and answers related to that inquiry.

1. Do PA-residents need a DSA, or, by virtue of being in a training program, are they exempt from a DSA?

Answer: Because all PAs are licensed, even those enrolled in a postgraduate training program, they must have a DSA in place to perform their duties.

2. Do PA-residents need designated supervising physician, or, by virtue of being in a training program, are they exempt from being supervised by designated physicians because their program director oversees their training?

Answer: Because all PAs are licensed, even those enrolled in a postgraduate training program, they must have a designated supervising physician in addition to a program director who oversees the training aspect of their work.

3. When PA-residents are rotating thru the various components (core and elective clinical courses) of their PG training, do they need a new DSA for every rotation?

Answer: If the PA-resident's duties change based on the various rotations of the training program, then a new DSA is required to outline the new duties. It can be with the same supervising physician or a new physician.

4. If PA-residents are rotating through a high-energy department (such as the Emergency Department), and doctors on call are coming and going, who is supervising the PA-resident and is a DSA required?

Answer: As stated before, a DSA always is required. As explained by PAC staff, PAs seldom are assigned to the Emergency Department. Instead, they are assigned to, for example, the Surgery Department, are supervised by a surgeon, and only work on-loan to the Emergency Department.

5. Can a PA-resident be supervised by a licensed medical resident?

Answer: Yes. Any licensed physician can supervise a PA.

6. Can a PA-resident be supervised by an unlicensed medical resident?

Answer: No. Only licensed physicians can supervise a PA.