

OSTEOPATHIC PHYSICIAN ASSISTANTS

What is an osteopathic physician assistant?

An osteopathic PA is a health care provider who is licensed by the Board of Osteopathic Medicine and Surgery (Board) to practice osteopathic medicine to a limited extent only under the supervision and control of an osteopathic physician.¹ The osteopathic PA must be physically and mentally capable of practicing osteopathic medicine with reasonable skill and safety.² All osteopathic PAs must wear identification or a badge identifying him or herself as an osteopathic PA at all times when meeting or treating patients.³

What is the difference between an osteopathic physician assistant (PA) and a certified osteopathic physician assistant (PA-C)?

A certified osteopathic physician assistant (PA-C) is an individual who has successfully completed an accredited and approved physician assistant program and has passed the National Commission on Certification of Physician Assistants examination.⁴ Effective July 1, 1999, an individual applying for a license as a physician assistant must have graduated from an accredited and approved physician assistant program and must be certified by successful completion of the national board examinations.⁵ Applicants for an interim permit will have one year from issuance of the interim permit to successfully complete the examination.⁶

An osteopathic physician assistant (PA) is an individual who successfully completed an accredited and approved osteopathic physician assistant program and was licensed in Washington State prior to July 1, 1999.⁷ An osteopathic PA may also be an individual who holds an interim permit prior to passing the certification.⁸

What must a osteopathic physician do to utilize a PA in the osteopathic physician's practice?

An osteopathic physician who wishes to use a licensed osteopathic PA must obtain approval from the Board.⁹ Before commencing practice, a licensed osteopathic PA must apply to the Board for permission to be employed or supervised by an osteopathic physician or physician group.¹⁰ The osteopathic physician or physician group and the licensed PA must jointly submit

¹ RCW 18.57A.010.

² WAC 246-854-080(3)(d).

³ WAC 246-854-015(5)(e).

⁴ WAC 246-854-080(1).

⁵ *Id.*

⁶ WAC 246-854-085(2).

⁷ WAC 246-918-005(2).

⁸ RCW 18.57A.010(1), WAC 246-854-085.

⁹ WAC 246-854-015(2).

¹⁰ RCW 18.57A.040(2).

to the Board a practice arrangement plan which delineates the manner and extent to which the osteopathic PA will practice and be supervised.¹¹

A licensed osteopathic PA may practice osteopathic medicine only with the Board's approval of the practice arrangement plan and only to the extent permitted by the Board.¹² A licensed osteopathic PA who has not received approval of the practice arrangement plan may not practice.¹³

May an osteopathic PA practice in a manner inconsistent with an approved practice arrangement plan?

No. The Board may take disciplinary action against an osteopathic PA who practices outside the approved practice arrangement plan.¹⁴

May an osteopathic physician assistants sign documents ordinarily signed by a licensed physician?

Yes. An osteopathic physician assistant may sign and attest to any document that might ordinarily be signed by a physician, including (but not limited to) birth and death certificates.¹⁵

Can military experience be used to become licensed as a PA in Washington?

Yes. An applicant for a license as an osteopathic physician assistant who has military training or experience satisfies the training or experience requirements to become licensed as a an osteopathic physician assistant unless the Board of Osteopathic Medicine and Surgery determines that the military training or experience is not substantially equivalent to the standards of this state.¹⁶

What is the supervising osteopathic physician's liability for the acts and omissions of an osteopathic PA?

Both the supervising osteopathic physician and the osteopathic PA retain professional and personal responsibility for the acts and omissions of the osteopathic PA.¹⁷

A supervising osteopathic physician may be disciplined for aiding and abetting the unlicensed practice of medicine if the osteopathic PA is permitted to practice medicine beyond the scope of practice approved by the Board.¹⁸

¹¹ *Id.*

¹² RCW 18.57A.030.

¹³ *Id.*

¹⁴ RCW 18.57A.030, 040.

¹⁵ WAC 246-854-035(3)

¹⁶ RCW 18.57A.023.

¹⁷ RCW 18.57A.050.

¹⁸ *Id.*

May an osteopathic PA prescribe legend drugs?

Yes. An osteopathic PA may prescribe legend drugs, when approved by the Board and designated by the supervising osteopathic physician on an approved practice plan,¹⁹ for a patient who is under his or her care or the care of the supervising osteopathic physician.²⁰ The supervising osteopathic physician must assume full responsibility for review of the osteopathic PA's prescription writing practices on an ongoing basis.²¹

May an osteopathic PA prescribe controlled substances?

Upon approval of the Board and when designated by the supervising osteopathic physician on an approved practice plan an osteopathic PA certified by the National Commission on Certification of Physician Assistants (PA-C) may issue prescriptions for drugs contained in Schedule II through V.²² A non-certified osteopathic PA may issue prescriptions for Schedule III through V controlled substances.²³

Whose DEA number must an osteopathic PA use if approved by the Board of Osteopathic Medicine and Surgery to prescribe controlled substances?

On written prescriptions for Schedule II through V controlled substances, an osteopathic PA who is approved by the Board to prescribe controlled substances must sign a prescription with his or her own name, and include the osteopathic PA's DEA registration number or, if none, the sponsoring osteopathic physician's DEA registration number,²⁴ followed by the letters "P.A." or "P.A.-C" and the PA's license number.²⁵

May an osteopathic PA practice in a location other than where the supervising osteopathic physician is located?

Yes. An osteopathic PA may practice at a remote site upon approval by the Board. A remote practice site means a setting physically separate from the supervising osteopathic physician's primary practice location or setting where the osteopathic physician is present less than 25% of the practice time of the osteopathic PA.²⁶ Such approval may be provided if:²⁷

- There is a demonstrated need for such utilization.
- Adequate provision exists for immediate communication between the supervising osteopathic physician or alternate physician and the osteopathic PA.

¹⁹ WAC 246-854-030(1).

²⁰ WAC 246-854-030(4).

²¹ WAC 246-854-030(7).

²² WAC 246-854-030(1)(a).

²³ WAC 246-854-030(1)(b).

²⁴ WAC 246-854-030(3).

²⁵ WAC 246-854-030(2).

²⁶ WAC 246-854-025(1).

²⁷ WAC 246-854-025(2).

- The supervising physician spends at least 10% of the documented and scheduled practice time of the osteopathic PA in the remote office site.
- The names of the supervising osteopathic physician and the osteopathic PA must be prominently displayed at the entrance to the clinic or in the reception area.

No osteopathic PA holding an interim permit may be utilized in a remote practice site.²⁸

Must an osteopathic physician review and countersign chart entries made by the osteopathic PA?

Yes, to some degree. The osteopathic PA and supervising osteopathic physician must ensure that the supervising osteopathic physician timely reviews all reports of abnormalities and significant deviations, including the patients' charts.²⁹ The supervising osteopathic physician or designated alternate must review and countersign all charts of a licensed osteopathic PA within 7 working days for the first 30 days of practice.³⁰ Thereafter, the supervising osteopathic physician or designated alternate must review and countersign 10% of the charts of the osteopathic PA within 7 working days.³¹ Every chart of a holder of an interim permit must be reviewed and countersigned by the supervising osteopathic physician or designated alternate within 2 working days.³²

What should a supervising osteopathic physician do when unable to supervise due to a temporary absence?

The supervising osteopathic physician must identify a designated alternate supervisor who will perform the supervisory responsibilities in the supervising osteopathic physician's absence.³³

²⁸ WAC 246-854-025(3).

²⁹ WAC 246-854-015(5)(a).

³⁰ WAC 246-854-015(5)(d)(i).

³¹ *Id.*

³² WAC 246-854-015(5)(d)(ii).

³³ WAC 246-854-015(7).