



State Medical Board of Ohio

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Physician Assistant Practice at Urgent Care Centers or Retail Clinics

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Physician Assistant (“PA”) practice at urgent care centers or retail clinics is permissible when the appropriate physician supervision, direction, and control are provided. When structuring the business model, however, it is imperative that the model reflect the appropriate relationship between the supervising physician(s) and the PA.

According to the Urgent Care Association of America, urgent care centers provide walk-in, extended hour access to adults and children for acute illness and injury care and care for conditions not severe enough to warrant a trip to the emergency room, with most facilities also treating fractures, providing IV fluids, and having x-ray and lab processing onsite. <http://www.urgentcarecenter.org/about.html>.

Retail clinic is the term commonly used to refer to a health care facility with an adjacent pharmacy that is located in a retail store. For additional information, see the website of the Convenient Care Association at http://www.ccaclinics.org/index.php?option=com_content&view=article&id=7&Itemid=119.

HISTORY

In the past, supervision agreements and supervisory plans for PA practice at urgent care centers or retail clinics had been approved by the Medical Board based upon the supervising physician’s signature certifying that all laws and rules related to the practice of physician assistants would be followed. However, it has become clear that not all of the requirements of the Ohio Revised Code and Ohio Administrative Code are being adhered to. For example, there are concerns that PAs have been assigned to practice at locations at which the supervising physician does not routinely, if ever, practice; the supervising physician does not regularly review the conditions of the patients treated by the PA; and supervising physicians may not be aware that they are responsible to provide direction, supervision, and control of the practice of specific PAs with whom the physician may have little or no interaction.

REQUIREMENTS

The following criteria are applicable to PA practice at an urgent care center or retail clinic based upon the language of Sections 4730.02, 4730.15, 4730.16, 4730.18, 4730.19, 4730.21, 4730.41, and 4730.411, Ohio Revised Code:

1. The supervising physician exercises supervision, direction, and control of the PA.
 - a. The supervisory plan, which sets out the practice activities in which the PA may engage, is between the supervising physician(s) and the PA.
 - b. The supervising physician is responsible for authorizing the PA to practice at a particular location at which the supervising physician routinely practices, determining the PA’s scope of practice based upon the PA’s capability to competently perform a service under the approved supervisory plan, authorizing the PA to prescribe according to the PA formulary and any conditions established by

- the supervising physician, and determining the level of supervision appropriate for the PA's practice.
- c. The supervising physician may be disciplined by the Medical Board for failing to provide supervision in accordance with the requirements of Chapter 4730, Ohio Revised Code, and Medical Board rules. (Section 4731.22(B)(31), Ohio Revised Code)
2. The supervising physician must provide on-site supervision in the following circumstances:
 - a. During the first 500 hours of the provisional prescribing period;
 - b. Whenever the supervising physician determines that on-site supervision is required.
 3. When not physically present, the supervising physician must be continually available through some means of telecommunication and must be in a location that under normal conditions is not more than sixty minutes travel time away from the PA's practice location.
 4. The supervising physician must provide oversight of the PA's practice via both of the following means:
 - a. Regular review of the conditions of the patients treated by the PA. This review is in addition to the formal quality assurance review required.
 - b. Comply with the quality assurance system for review of patient record entries made and selected medical orders issued by the PA. Quality assurance review must occur two times during the first year of the PA's practice, then annually thereafter.
 5. The supervising physician may not supervise more than two PAs who are practicing at any one time.
 6. A supervising physician may authorize a PA to practice in a setting in which the supervising physician routinely practices. "Setting in which the supervising physician routinely practices" is defined in Rule 4730-1-01(B)(2), Ohio Administrative Code, to mean "a practice environment in which the supervising physician *ordinarily* provides medical services." (Emphasis added)
 7. Each time a PA writes a medical order, including prescriptions, the PA shall sign the order and record the date and time of the order. The order must clearly identify the name of the supervising physician under whose supervision the PA was authorized to write the order.

PRESCRIBING RESTRICTIONS

Urgent Care Centers

A PA may not prescribe any Schedule II drugs at an urgent care center unless one of the following conditions is met:

- a. The urgent care center meets all of the following criteria:
 - It is the site where a medical practice is operated;
 - The medical practice is organized to provide direct medical care;

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- The medical practice is owned by one or more physicians;
 - The PA has entered into a supervision agreement with at least one of the physician owners; and
 - The physician owner who has entered into the supervision agreement practices primarily at the urgent care center.
- b. The urgent care center is part of a hospital, owned or controlled by a hospital, or owned or controlled by an entity that owns or controls, in whole or in part, one or more hospitals.
- c. The patient is in a terminal condition, the supervising physician initially prescribed the Schedule II drug for the patient, and the prescription is for an amount that does not exceed the amount necessary for a single 24-hour period.
- d. The urgent care center is one of the locations described in Section 4730.411(B), Ohio Revised Code.

Retail Clinics

A PA may not prescribe any Schedule II drugs at a retail clinic. There are no exceptions to this prohibition.

For additional information or questions:

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In this statement the Medical Board does not announce a new rule but instead gives licensees specific guidance regarding the Physician Assistant Practice Act, Chapter 4730, Ohio Revised Code.

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