

**Frequently Asked Questions  
Regarding Changes to the Physician Assistant Rules  
Arizona Regulatory Board of Physician Assistants  
Effective October 6, 2012 Revised March 1, 2013**

Diligent care has been taken to avoid any contradiction between the FAQs and the actual enacted legislation and proposed rules. Any inconsistency or conflict is unintentional. To the extent that there is an appearance of conflict or inconsistency, the actual rules shall take precedence over these guidelines, and the statutes shall take precedence over the rules.

**I am a physician assistant licensed in Arizona. Do I need to have a Prescribing Authority Form on file at the Board?**

No. A.A.C. R4-17-203.D states:

“When the Board (Arizona Regulatory Board of Physician Assistants) issues a regular license to an applicant, the Board is also approving the applicant to issue prescriptions or dispense or issue schedule II or schedule III controlled substances.”

A physician assistant may prescribe up to 30 days of Schedule II and III controlled substances if the Board approves,<sup>1</sup> the Delegation Agreement on file at the practice site includes delegation by the PA’s supervising physician(s) to prescribe Schedule II and III controlled substances, and the PA has a current DEA registration with matching authority. (A.R.S. 32-2532(A)(1).

In order for the Board to comply with A.R.S. 32-2532.J, any modification to the Board-approved prescribing authority that is reflected in the Delegation Agreement must be on file with the Board.

**Do I need to include the name of my supervising physician on written and/or electronic prescriptions?**

Yes; all prescription orders issued by a physician assistant shall contain the name, address and telephone number of the supervising physician. (A.R.S. 32-2532(B). This includes written and electronic prescriptions

**If I have multiple supervising physicians, who should be included on written and/or electronic prescriptions pursuant to A.R.S. 32-2532 (B)?**

If the physician assistant is supervised by more than one supervising physician, only one name must appear on the prescription order.

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<sup>1</sup> Under current law, the Board will approve physician assistants for thirty day prescription privileges if they are certified by a national commission on the certification of physician assistants at the time of licensure. (A.R.S. § 32-2504(A)(11). Meeting this requirement is never an issue because A.R.S. § 32-2521(A)(2) requires all initial applicants to pass the certifying examination of the National Commission on the Certification of Physician Assistants before a license is granted.

**How can a pharmacist verify that a P.A. has authority delegated by his or her supervising physician to prescribe Schedule II and III controlled substances, and whether they are delegated to prescribe up to 30 days?**

Any modifications to the 30-day prescribing authority that is reflected in the Delegation Agreement must be on file with the Board. A form can be found at [www.azpa.gov](http://www.azpa.gov) under PA center.

**I work in a hospital or large clinical practice at which I am supervised by multiple physicians. Do I need to have a Prescribing Authority Form on file at the Board with each supervising physician?**

*No; the Board is no longer accepting or entering Prescribing Authority Forms. Any prescribing authority must be reflected in each Delegation Agreement on file at your practice site. Only modifications must be submitted to the Board.*

**I work in a hospital or large clinical practice at which I am supervised by multiple physicians. Do I need to have a Delegation Agreement with each supervising physician?**

*Yes; the law requires that each physician assistant has a Delegation Agreement **in the practice office** with each supervising physician by whom the PA is supervised. The Delegation Agreement must include delegation of prescribing authority.*

**I had a Notice of Supervision (NOS) on file with the Board prior to January 1, 2011. Do I need to have a new Delegation Agreement on file at my practice?**

*Yes; effective January 1, 2011, each supervising physician must have a Delegation Agreement on file at the practice, updated annually, and available to the Board upon request.*

**I had a Notice of Supervision (NOS) on file with the Board prior to January 1, 2011. Do I need to submit a Prescribing Authority Form to the Board?**

*No. the Board is no longer accepting or entering Prescribing Authority Forms. Any prescribing authority must be reflected in each Delegation Agreement on file at your practice site, and any modifications must be submitted to the Board.*

**What must be included in a Delegation Agreement?**

*The agreement must include:*

- *A statement that the physician will exercise supervision over the PA and retain professional and legal responsibility for the care rendered by the PA;*
- *Signatures of the supervising physician and the PA;*
- *An annual update;*

*In addition, the physician and PA team must ensure that:*

- *The PA's scope of practice is identified, including prescribing authority;*
- *The delegation of medical tasks is appropriate to the PA's level of competence;*

- *The relationship of, and access to, the supervising physician is defined; and*
- *A process for evaluation of the PA's performance is established.*

**If the PA works at a different site than the Supervising Physician, how often must they meet?**

*The PA must meet in person or by telecommunication with a supervising physician at least once each week to ensure ongoing direction and oversight of the physician assistant's work. Also, the patient records must be made available to the supervising physician.*

**Can a supervising physician have delegation agreements with more than four PA's as long as they are not supervised at the same time?**

*Yes, there is no limit to the number of PA's with whom a physician has a delegation agreement. However, the physician may only engage in supervising four PA's at one time, regardless of where they are geographically located.*

**Since there is no longer a requirement that the Board approves a Notice of Supervision, (NOS), can a PA provide healthcare more independently than before the law changed?**

*No; a PA's ability to perform healthcare tasks remains the same. The PA still must establish and maintain a relationship with a supervising physician. The PA and the supervising physician must enter into a Delegation Agreement.*

**Do I need to submit to the board a list of all addresses I practice at as a PA?**

*No, you are only required to provide one primary practice location. This address will be on your profile on the website. Please use the change of address form to update any change in practice, mailing or home address. [Link to Change of Address Form](#)*

**Can a PA sign a death certificate?**

*Yes, if delegated by the supervising physician, a PA may sign a death certificate. A.R.S. §36-301*