



# American Academy of Physician Assistants

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## MEMORANDUM

**TO:** Ann Davis, PA-C, Director, State Government Affairs  
**FROM:** Stephanie M. Dyson, Assistant Director, State Government Affairs  
**DATE:** March 29, 2007  
**SUBJ:** Supervision Requirements Imposed by Federal Programs

The Academy received an information request on supervision requirements imposed by federal programs for rural health clinics (RHCs), critical access hospitals (CAHs) and federally qualified health centers (FQHCs).

As to rural health clinics, 42 C.F.R. § 491.81(b)(2) provides that the physician is expected to be on site once every two weeks. The relevant text of the Code reads in part, “A physician is responsible for being present for sufficient periods of time, at least once in every 2 week period (except in extraordinary circumstances), to provide medical direction, medical care services, consultation and supervision and is available through direct telecommunication for consultation, assistance with medical emergencies or patient referral...”

For critical access hospitals, 42 C.F.R. § 485.631(b) recently clarified the applicable rule to require physicians to periodically review and sign a sample of outpatient records of patients cared for by PAs, NPs, etc... The rule states that “periodically” means not less than every two weeks, unless state law does not require record reviews or co-signatures. The Code provides, “The doctor of medicine or osteopathy... (iv) Periodically reviews and signs the records of all inpatients cared for by nurse practitioners, clinical nurse specialists, certified nurse midwives, or physician assistants. (v) Periodically, but not less than every 2 weeks, reviews and signs a sample of outpatient records of patients cared for by nurse practitioners, clinical nurse specialists, certified nurse midwives, or physician assistants according to the policies of the CAH and according to current standards of practice where State law requires record reviews or co-signatures, or both, by a collaborating physician.”

Lastly, as to federally qualified health centers, there are no “national standards.” Physician-PA teams practicing in FQHCs must abide by state law. The FQHC program imposes no additional requirements.