


COMPLIANCE TIP

TO: Compliance Alert Distribution List

FROM: Sue Stack, CPC, CPMA 
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SUBJECT: Are You Up to Date?

DATE: March 9, 2018

Are you up to date? I am referring to being up-to-date with PA Supervision Forms and ARNP protocols and collaboration agreements. As part of licensure requirements, both PAs and ARNPs are to submit information concerning supervising/collaborating physicians to their respective boards. Physician Assistants are to complete Supervision Data Forms with the name(s) of the physician(s) supervising them. ARNPs are to list collaborating physicians on their ARNP Protocols. Both are to be submitted within 30 days of employment and within 30 days of a change in locations or supervising or collaborating physicians. The ARNP protocols also are to be filed with the Board of Nursing every two years.

It is important to have this information on file since the PA's supervising physician(s) must ensure that PAs have been trained to perform the services they are assigned to do. The services rendered must be within the supervising physician's scope of practice. Without the supervising physician information, it would not be readily apparent that the PA is performing the services that they have been trained for and that those services are within the physician's scope of practice.

With ARNP's, physicians collaborate with them to treat patients. There is more independence for the ARNP than the PA but the ARNP has to have a physician available to consult with. The collaborating physician needs to submit an ARNP/EMT/Paramedic Protocol Form to the Board of Medicine. Besides the names of the collaborating physician(s), the ARNP Protocol also includes the duties of the collaborating physician(s) and the scope of practice for the ARNP. The scope of practice includes treatments that the ARNP may perform and those conditions that the physician needs to personally evaluate.

Any PA and ARNP who recently joined UFJPI should complete the required forms and submit them to the appropriate regulatory board and to the Office of Compliance. Copies of

current supervision forms, collaboration agreements and protocols must be kept on file in the location(s) where the NPP practices. It is vital that the supervising/collaborating physicians' information is on file when a Non-Physician Practitioner (NPP) begins seeing patients. Without this information, it is not apparent that the NPP is properly supervised.

Any changes need to be submitted to the appropriate regulatory board. When a new NPP changes employers, it is very important that the required forms are updated and do not have former supervising/collaborating physicians listed as current. If a NPP transfers to a new department, a new PA Supervision Data Form or ARNP Protocol needs to be completed. New forms also need to be submitted to the appropriate regulatory board if there is a change in supervising/collaborating physicians. If a new physician to the organization will be supervising a PA or collaborating with an ARNP or if a supervising/collaborating physician leaves the organization, a revised supervision data form/protocol needs to be submitted to the appropriate regulatory board indicating the change in status of the supervising/collaborating physician.

As part of New Provider Baseline Reviews and routine departmental reviews, the Office of Compliance verifies that PA supervision data forms and ARNP protocols are up to date. Out of date forms put the organization at risk as well as the NPP's license. While the administrative personnel of the NPP's department may assist in maintaining current forms and protocols, it is ultimately the NPP's responsibility to ensure this occurs.

Lastly, supervision forms, collaboration agreements and protocols should not be discarded when a NPP terminates employment. Instead, follow UF Record Retention policies for maintenance and destruction rules.

Do your part in ensuring that current information is on file whether you are the NPP, a supervising or collaborating physician, a clinic administrator or a medical department administrator.

Please share with faculty supervising nonphysician practitioners, nonphysician practitioners, clinic staff and medical department administrators. If you have any questions, please contact the Office of Compliance at (904) 244-2158.

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