



Michael R. Pence, Governor

Virgil R. Madden, Executive Director

Dear Indiana Physician Assistants:

P.L. 102-2013 was recently signed by Governor Pence and identifies several practice changes for Physician Assistants. Highlights of this new law that will take effect on **July 1, 2013**, are as follows:

- A physician assistant may now prescribe a schedule II controlled substance, with the limitations listed below.
- A physician assistant may prescribe a Schedule II, III, IV and V controlled substance, in an aggregate amount, that does not exceed a thirty (30) day supply. Any refills or subsequent prescriptions beyond the thirty (30) day supply must be authorized by the supervising physician and recorded in the patient's medical records.
- The requirement to practice in a contingent or non-contingent county has been deleted and replaced with the requirement that if the supervising physician or the physician designee is not present in the same facility as the physician assistant, the supervising physician or physician designee must be within reasonable travel distance from the facility to personally ensure proper care of the patients.
- The review of patient encounters will require review within 72 hours for the following:
 - 100% of the charts for the first year of employment
 - 50% for the second year of employment
 - 25% for the third year of employment
 - For the first year in which a physician assistant obtains authority to prescribe controlled substances, 100% of the patient records for which a controlled substance is being dispensed or prescribed.

If a physician assistant changes supervising physicians but remains in the same practice specialty, the schedule of chart review does not start over. However, if the PA is employed in a different practice specialty, the full schedule of chart review listed above must be followed.

- A year – or 1800 hours of practice experience, is no longer required to prescribe non-controlled substances.
- A physician may enter into a supervising agreement with more than two (2) physician assistants but may NOT physically supervise more than two (2) at any given moment.
- PAs are now required to submit a list of all locations that the PA and the supervising physician may practice.

Questions pertaining to the above may be identified below in the Frequently Asked Questions.

FREQUENTLY ASKED QUESTIONS

Q: I have prescriptive authority but now need to prescribe Schedule II narcotics. Will I need to submit anything to Professional Licensing Agency?

A. Yes, if you have any changes in which encompass the above laws, you will need to **submit a new supervisor agreement** which reflects the changes as well as list all the original requirements found in Ind. Code § 25-27.5-5-2(a)(f). You will also need to submit a signed letter requesting that C-II be added to your Controlled Substance Registration. You may submit the above practice changes at any time to
Indiana Professional Licensing Agency
Attn: Physician Assistant Committee
402 West Washington Street, Room W064
Indianapolis, IN 46204

Q. Will I need to do anything to reflect on my DEA registration that I am prescribing Schedule II controlled substances?

A. Yes, to add C-II on your DEA registration, you will need to go www.deadiversion.usdoj.gov and click the link on the right that says 'Registration Change Request'. Log in using the information on your current DEA certificate. Make your updates and then scroll to the bottom to certify and submit.

Q. I have been practicing less than a year but would like to prescribe non-controlled substances. What do I need to do?

A. If you have practiced less than a year and are requesting initial authority to prescribe non-controlled substances, you will need to submit the prescriptive authority application and the supporting documentation, which can be found online at <http://www.in.gov/pla/3062.htm>. A PA is **not** eligible to prescribe controlled substances until they have at least a year (and 1800 hours) of practice experience.

Q. Am I able to prescribe C-IIs before July 1, 2013.

A. Prescriptive Authority changes will not occur exactly on July 1. It is not legal to prescribe C-IIs until the PA verifies their CSR license has been updated by the state of the Indiana AND the DEA license from the US government. All prescriptive authority applications must be approved by both the Physician Assistant Committee and the Medical Licensing Board.

Q. How do I know if the practice agreement was approved and C-II have been added to my CSR?

A. You may verify the addition of C-IIs being added to your CSR after July 1st online at <http://www.in.gov/pla/3119.htm>

Q. How do I print a new CSR?

A. CSR may be printed at <http://www.in.gov/pla/3120.htm> by logging in with your license number as the user id and the last 4 digits of your social security number as the password.

Q. Do I need to update the practice agreement annually with your office?

A. Practice agreements need to be reviewed and updated annually by you and your supervising physician and be kept on file in your office for committee inspection.

Q. I job share with 3 other physician assistants. Can we all be supervised by the same physician?

A. One physician may have practice agreements with all 4 PAs, however, he/she may supervise only 2 PAs during a particular employment "shift".

Q. If I prescribe a controlled substance in a 7 day supply to a patient, may I prescribe another 5 day supply 10 days later?

A. Yes, as long as you don't prescribe and amount to exceed a 30 day supply and **subsequent** prescriptions/refills are authorized by your supervising physician.

Q. How do I find a copy of the recent legislation?

A. The copy of the House Enrolled Act, with the specific language, may be accessed online at <http://www.in.gov/legislative/bills/2013/HE/HE1099.1.html>

If you have further questions about any of these changes, please contact Kristen Kelley, Board Director at (317) 234-2060 or via email pla3@pla.IN.gov