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GAVIN NEWSOM
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Index: Program Administration

TO: California Children's Services Program County Administrators, Medical Consultants, and Integrated Systems of Care Division Staff

SUBJECT: Program Requirements for Physician Assistants Providing Patient Care in Neonatal Intensive Care Units

I. PURPOSE

This Numbered Letter (N.L.) describes the minimum requirements for Physician Assistants (PA) at California Children's Services (CCS) Program-approved Neonatal Intensive Care Units (NICU) to provide direct patient care.

II. BACKGROUND

CCS Standards for NICU care at the Regional, Community, and Intermediate levels currently do not address a role for PAs to provide direct patient care at NICUs in California. In addition, nationwide standards do not exist to train or credential PAs to provide care in a NICU. This N.L. reflects consultation with faculty at nationally respected NICU PA training programs and neonatologists at NICUs where PAs provide direct patient care – both within California and nationally.

III. POLICY

- A. Consistent with Title 16, Division 13.8, Article 4, Section 1399.540¹ of the California Code of Regulations, neonatologists may delegate the provision of NICU care services to qualified PAs.

A PA who meets all of the following requirements in 1 – 5 below may provide delegated services to patients in the NICU under the supervision of a CCS-paneled attending neonatologist:

¹ Section 1399.540. Limitation on Medical Services

[https://govt.westlaw.com/calregs/Document/IEA3937B0078511E3B667C65989304E0E?viewType=FullText&originati onContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/IEA3937B0078511E3B667C65989304E0E?viewType=FullText&originati onContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

1. Successful completion of either:
 - a. A PA program accredited by the Accreditation Review Commission on Education for the Physician Assistant and at least two years of NICU practice experience as defined below; or
 - b. A master's program in PA Studies and at least one year of NICU practice experience as defined below:

NICU practice experience is defined as full time (at least 40 hours per week) clinical activities including professional mentoring, formally structured didactic teaching, skills training such as simulations followed by constructive feedback, and direct NICU supervised patient care, at a CCS Community level NICU, a CCS Regional level NICU, or an American Academy of Pediatrics level III or level IV NICU. Additional clinical experience settings must include all of the following:

 - (1) An obstetrical delivery room.
 - (2) A well-baby nursery or similar area of the hospital.
 - (3) An operating room.
2. Certified by the National Commission on Certification of Physician Assistants.²
3. Maintains a current license from the California Physician Assistant Board.³
4. Maintains a current certification by the American Academy of Pediatrics and the American Heart Association as a Neonatal Resuscitation Program Provider.
5. Maintains a current written "Delegation of Services" agreement which specifies what medical services the PA may provide under the supervising neonatologist who is responsible for the patient's care. The "Delegation of Services" agreement authorizing the PA to provide delegated medical services must be signed and dated by both the PA and the supervising neonatologist.

² National Commission on Certification of Physician Assistants
<https://www.nccpa.net/>

³ California Physician Assistant Board
<https://www.pab.ca.gov>

- B. A supervising neonatologist must also meet the following requirements to delegate the provision of medical services to a NICU PA:
1. Provide to the CCS Facility Review Team, at CCSFacilityReview@dhcs.ca.gov, a written "Delegation of Services Agreement" as required under Title 16, Division 13.8, Article 4, Section 1399.540 of the California Code of Regulations, and as referenced in section III.A.5., above. This document should specify the on-call schedule structure and services that may be provided, including: patient evaluations; problem formulations and care plans; care orders that a PA may write; procedures that a PA may perform; description of initial NICU orientation period preceptorship including duration, limitations, and patient load. This document also should describe requirements for continuing education, periodic review of clinical performance, and confirm agreement on complete scope of work by the hospital and medical group employing/supervising the PA.
 2. A supervising neonatologist who is a signatory to any PA delegation of services agreement must review and cosign, within 24 hours, all PA activity and medical record documentation performed by the PA.
 3. At each NICU which utilizes PA services, all policies and procedures governing PA NICU patient management and physician/PA communication must be approved by the CCS Facility Review team.

If you have any questions regarding this Numbered Letter, please contact the ISCD Medical Director or designee at ISCD-MedicalPolicy@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Roy Schutzengel
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