

**DATE:** November 3, 2023 N.L.: 08-1023  
Index: Program Administration

**TO:** All California Children Services Program County Administrators,  
Medical Consultants, the Clinical Assurance Division, and  
Integrated Systems of Care Division Staff

**SUBJECT:** Requirements for Certified Physician Assistants in California Children's  
Services Special Care Centers

## I. PURPOSE

The purpose of this Numbered Letter (NL) is to outline California Children's Services' (CCS) Program requirements for certified Physician Assistants (PA) to work in CCS Program Special Care Centers (SCC) as part of CCS Program SCC multidisciplinary teams. Additionally, this NL outlines requirements for PAs to prescribe, order, or request CCS services in a SCC setting. This NL does not address practice requirements for PAs outside of CCS Program SCCs.

## II. BACKGROUND

The intent of the CCS Program is to ensure CCS-eligible beneficiaries are provided the medically necessary services to correct or ameliorate the CCS-eligible conditions. The Department of Health Care Services (DHCS) has oversight of the services provided under CCS Program to assure a high quality of service.<sup>1</sup>

CCS Program SCCs are hospital-affiliated centers that provide specialty care to children with CCS Program medically eligible conditions.<sup>2</sup> SCC care is provided and coordinated by a multidisciplinary team under the direction of a Medical Director, who is a CCS-paneled pediatrician with specialty board certification and experience managing CCS Program medically eligible conditions.<sup>3</sup> PAs participate in the CCS Program as optional members of a multidisciplinary team, in an outpatient or inpatient SCC, providing services to children with CCS-eligible medical conditions.<sup>4</sup>

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<sup>1</sup> Health & Safety Code § 123805, 123825, and 123925.

<sup>2</sup> 22 California Code of Regulations Section 42130

<sup>3</sup> Chapter 3.37 Provider Core Standards

<sup>4</sup> Completion of a Certificate of Added Qualifications in Pediatrics (CAQ-Peds) may be required to provide care in certain SCCs, as noted in the specialty-specific standards.

### III. POLICY

#### A. Scope of the PA in a CCS SCC Setting

The SCC team may include PAs, who function as clinical staff under physician supervision, pursuant to a PA license.<sup>5</sup> PAs are Non-Physician Medical Practitioners (NMPs) that are approved by the Physician Assistant Board of California to perform direct patient care services under the supervision of a licensed physician. Medi-Cal providers who employ or use the services of NMPs are required to develop a system of collaboration and physician supervision with each NMP.<sup>6</sup> The physician/practitioner practice agreement establishes the means by which the medical treatment services that physicians and NMPs provide are integrated and consistent with accepted medical practice.<sup>7</sup>

#### B. PA Paneling Requirements

A PA can apply to become CCS-paneled by submitting a paneling application through the CCS Program Panel Portal website.<sup>8</sup> All PA applicants must demonstrate proof of compliance with the requirements detailed below. An expired certification or lack of proof of the requirements referenced above will result in the denial of an application.

The CCS Program requirements for a PA to be paneled are as follows:<sup>9</sup>

1. Be licensed by the state of California as a Physician Assistant;
2. Be certified by the National Commission on Certification of Physician Assistants;
3. Have an individual National Provider Identifier (NPI) enrolled with Medi-Cal; and
4. Have a minimum of two years of post-training experience as a PA, of which at least one year must include providing services to children with CCS-eligible medical conditions.

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<sup>5</sup> Bus. & Prof. Code § 3502

<sup>6</sup> [Medi-Cal Provider Manual: Non-Physician Medical Practitioners](#)

<sup>7</sup> Bus. & Prof. Code § 3502

<sup>8</sup> [CCS Provider Paneling Portal](#)

<sup>9</sup> [CCS Provider Paneling Portal](#)

### C. PA Procedures

1. PAs in SCC settings must practice under the scope of a written practice agreement.<sup>10</sup> For the purposes of the CCS Program, this practice agreement must include:
  - a. The on-call schedule structure and services that the PA may provide, such as patient evaluations, problem formulations and care plans, care orders, and medical procedures that may include central venous cannulation, arterial cannulation, endotracheal intubation, thoracocentesis, and abdominal paracentesis;
  - b. A description of the initial SCC orientation preceptorship period, including duration, practice limitations, and patient load;
  - c. Requirements for continuing education, a periodic review of clinical performance, and an agreement on scope of work by the hospital and medical group employing and supervising the PA; and
  - d. Requirement to consult the supervising physician, before the PA approves, signs, modifies, or adds to a plan of treatment or plan of care of beneficiaries receiving home health services or personal care services.<sup>11, 12</sup>
2. A supervising physician who is a signatory to any PA practice agreement must review and cosign all activity and medical record documentation performed by the PA within the following timeframes:
  - a. 24 hours for intensive care units (Neonatal Intensive Care Units [NICU], Pediatric Intensive Care Units [PICU], and critical care units);
  - b. 72 hours for outpatient expedited authorizations; and
  - c. 10 business days for standard authorizations (such as continuation of services).

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<sup>10</sup> [Medi-Cal Provider Manual: Non-Physician Medical Practitioners](#)

<sup>11</sup> Bus & Prof Code § 3502.3 (2022)

<sup>12</sup> Cal. Code Regs. Tit. 22, § 41452

#### D. PA Ordered or Prescribed CCS Program Covered Services

The physician is the primary prescriber for CCS beneficiaries.<sup>13, 14</sup> However, PAs may order, prescribe, or request a CCS Program service in a SCC if the service is referenced in the SCC physician plan of care and the service is within the PA's scope of practice, which is under the supervision of a CCS-paneled SCC physician.

#### E. Other Requirements

1. PAs must follow all CCS Program SCC, NICU, and PICU policies, procedures, and specialty care standards applicable to the PAs practice in these settings.
2. This practice agreement must be kept on file at the provider's or SCC's office, readily available for review by DHCS upon request.<sup>15</sup>

#### F. Reimbursement for PA Services

PAs are employed by a Medi-Cal provider but are not an independent Medi-Cal provider.<sup>16</sup> Because they are enrolled as Medi-Cal ORP-only providers (Ordering, Referring, Prescribing), PAs cannot bill directly for independent office or inpatient visits. Reimbursement for services rendered by a PA can be made only to the employing physician, organized outpatient clinic, or hospital outpatient department.

If you have any questions regarding this N.L., contact the ISCD Medical Policy at [ISCD-MedicalPolicy@dhcs.ca.gov](mailto:ISCD-MedicalPolicy@dhcs.ca.gov).

Sincerely,

#### **ORIGINAL SIGNED BY**

Cortney Maslyn, Chief  
Integrated Systems of Care Division  
Department of Health Care Services

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<sup>13</sup> Cal. Code Regs. Tit. 22, § 41452

<sup>14</sup> Cal. Code Regs. § 42030

<sup>15</sup> [Medi-Cal Provider Manual: Non-Physician Medical Practitioners](#)

<sup>16</sup> [Medi-Cal Provider Manual: Non-Physician Medical Practitioners](#)