July 1, 2025 is the fifth anniversary of the effective date of Act 123, the law that significantly updated the relationship between Physician Assistants and physicians (whether MDs or DOs). Vermont is one of many states that have lessened the paperwork and the formalities for PAs and the physicians who have a documented relationship with a PA.

The changes have offered many upsides for PAs and physicians.

* It is no longer necessary to have a documented “supervising physician” available whenever a PA is working. The requirement is only to have a plan in place for a PA to have access to physician consultation when practicing. Telephone and electronic communication suffice.
* There is no need to have “secondary supervisors,” only to have one Participating Physician.
* The only documentation required is the Practice Agreement with the one Participating Physician.
* It is not necessary to file a new Practice Agreement each time a PA renews their license. The requirement is only for there to be an agreement on file with the Board and for it to be reviewed by the PA and Participating Physician at the time of renewal (and the review documented).
* The Board accepts scanned & emailed copies of Practice Agreements.
* Language providing that a supervising physician was legally liable for activities delegated to a PA was eliminated. Vermont law now states that PAs are responsible for their own medical decision making and that the existence of a practice agreement alone does not make the physician legally liable for a PAs actions or inactions.

However, the transition to the new standards has not been problem free. While elimination of the requirement to execute a new document for every PA license renewal lessens the paperwork obligation, it puts the onus on the physician assistant and the Participating Physician to remember to review the agreement at the time of the PA renewal.

In late May the Board sent a reminder to all Vermont-licensed Physician Assistants about the requirements to:

* have a Participating Physician;
* have a current Practice Agreement on file with the Board; and
* review Practice Agreements with the Participating Physician no less frequently than at the time of Physician Assistant license renewals. (PA licenses expire every two years on January 31 of even-numbered years.)

Of course, the requirements apply to only PAs who actively practice in Vermont (either physically present or practicing via telemedicine).

Our goal is to help licensees avoid situations where a PA practices without having a current and appropriate Practice Agreement on file. Situations that may lead to problems include:

* The PA and the Participating Physician both fail to ensure that a Practice Agreement is reviewed at the time of the PA’s license renewal, and revised if necessary.
* The departure of a physician from a practice may cause a PA to be out of compliance. Sometimes this happens when the physician retires, sometimes upon a job change.
* Revisions to a PA’s job duties may also trigger a need for a new Practice Agreement.
* Sometimes, there is a current and valid Practice Agreement, but it is not filed with the Board. Miscommunication with administrative staff is often a contributing factor in those cases.

The new standards for the PA – Participating Physician relationship were designed to reduce non-essential paperwork and acknowledge the reality that PA practice has evolved to a model that is closer to independent practice, while at the same time ensuring that each PA has a recognized relationship with a physician to promote maintenance of high standards in their practice of medicine. [Act 123](https://legislature.vermont.gov/Documents/2020/Docs/ACTS/ACT123/ACT123%20As%20Enacted.pdf) is still available on the General Assembly’s website. Those interested in seeing just what changed may want to look there. Most of the changes were in [Chapter 31 of Title 26, Vermont Statutes Annotated](https://legislature.vermont.gov/statutes/chapter/26/031). That’s where to see the current law regarding PAs in full. [The Board’s Administrative Rules](https://www.healthvermont.gov/sites/default/files/document/reg-board-medical-practice.pdf) provide some additional guidance regarding PA practice and Practice Agreements.

PAs can quickly and easily check to see who is on record with the Board as being their Supervising Physician by looking themselves up on the Board’s [public site](https://mpb.health.vermont.gov/Lookup/LicenseLookup.aspx) (not their private account for licensing). Physicians can see which PAs have a Practice Agreement on file with the Board that names them as the Supervising Physician by using the same [public site](https://mpb.health.vermont.gov/Lookup/LicenseLookup.aspx). We are always happy to answer questions about these requirements. Feel free to reach out by email or telephone.