

This policy applies to: <i>Stanford Health Care</i> <i>Lucile Packard Children’s Hospital</i>	Last Approval Date: April 2025
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I. PURPOSE

SHC/LPCH shall not permit any medical or physician assistant student to perform any service for which a license, certificate of registration or other form of approval is required unless the service is performed as part of a course of study of the Stanford University School of Medicine under the proper direction and supervision of the appropriate medical staff member.

II. POLICY STATEMENT

It is the policy of SHC/LPCH to require that all medical and physician assistant students or unlicensed foreign medical graduates engaged in any patient care activities be supervised by a member of the active SHC/LPCH Medical Staff within a program of supervised clinical training, in compliance with the California Code of Regulations Title 22 section 70705, Title 16 section 1327, as well as the California Business and Professions Code, Sections 2064 and 2104.

III. PROCEDURES

A. Eligibility

For the purposes of this policy, “medical student” or “physician assistant student” is defined as any of the following:

1. Medical Student - A student currently enrolled in the Stanford University School of Medicine as a candidate for an M.D. degree.
2. Physician Assistant Student – A student currently enrolled in the Stanford University School of Medicine, Master of Science in Physician Assistant Studies program as a candidate for a M.S. degree in Physician Assistant Studies.

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3. A student currently enrolled in his or her fourth or final year of an M.D. or D.O. program at a school accredited by the Liaison Committee on Medical Education or by the Education Department of the American Osteopathic Association on a Stanford Rotation registered through the Office of Student Affairs for the Stanford School of Medicine. Stanford Medical School offers a maximum of three months of elective rotations to visiting students.

4. A student who is a citizen of the United States, is a graduate of a foreign medical school or has completed all formal requirements for graduation except for internship or social service, and who intends to seek licensure as a physician and surgeon in California may enroll in a program of clinical training under the direction of the Stanford University School of Medicine that has been approved by the State of California Division of Licensing.

A medical student may not participate in patient care activities at SHC/LPCH unless the medical student has enrolled in a clerkship through the Stanford University School of Medicine Office of Student Affairs.

B. Patient Care Activities for medical students in a U.S. medical program

A medical student may perform patient care activities if:

1. Any medically related activity performed by the medical student is part of the course of study when enrolled in or registered as a student in a prescribed course of study at Stanford University School of Medicine, either as a regularly enrolled student of the School of Medicine or registered as a Visiting Clinical Clerk.

2. Any medically related activity performed by the medical student is under the proper direction and supervision of a licensed physician credentialed to perform such services at SHC/LPCH.

C. Patient Care Activities for graduates of foreign medical programs

United States citizens who are graduates of a foreign medical school may practice medicine in a clinical training program approved by the Office of Student Affairs if:

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1. Any medically related activity performed by the medical student is part of the course of study when enrolled in or registered as a Visiting Clerk in a prescribed course of study at Stanford University School of Medicine.
 2. Any medically related activity performed by the medical student is under the proper direction and supervision of an active staff member who holds a faculty appointment at the School of Medicine.
- D. Patient Care Activities for Physician Assistant students in the Stanford Master of Science in Physician Assistant Studies program

A physician assistant student may perform patient care activities as long as:

1. Any medically related activity performed by the physician assistant student is part of the course of study when enrolled in or registered as a student in a prescribed course of study at Stanford University School of Medicine.
 2. Any medically related activity performed by the physician assistant student is under the proper direction and supervision of a licensed physician, or advanced practice provider (APP) who is credentialed to perform such services at SHC/LPCH.
- E. Documentation
1. Physician Assistant students may document services in the medical record. The supervising physician may not refer to a student's documentation of physical exam findings or medical decision making in his or her personal note.

Medical students may document services in the medical record with the appropriate verification of history and physical exam, review of the note, and the creation of the plan with the student by the credentialed faculty. This documentation must be attested by the supervising physician as such.

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2. Medical students will identify their signatures with MS (Medical Student), just as licensed physicians identify their signatures with MD.

Physician Assistant Students will identify themselves as PA-S (Physician Assistant -Student)

F. Orders

Medical students may write orders for drugs or treatment provided that:

1. The order is written under the proper direction and supervision of the medical staff physician;
2. The medical students are assigned to or are consultants to the service caring for the patient to whom the order pertains.
3. A licensed physician (including licensed house officers) countersigns all orders before the orders are executed.
4. Medical Students are not permitted to issue verbal or telephone orders.

G. Medical students may act as substitute interns functionally, but they are still subject to the above provisions.

H. Medical students and physician assistant students will wear badges identifying them as “medical students” or “physician assistant students” at all times while at SHC/LPCH or the School of Medicine.

I. SHC/LPCH shall not remunerate medical or physician assistant students for medical services rendered.

IV. DOCUMENT INFORMATION

A. Legal Authority/References

1. California Business and Professions Code, Section 2064
2. California Business and Professions Code, Section 2104
3. Title 22 section 70705
4. Title 16 section 1327

B. Author/Original Date

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- C. Gatekeeper of Original Document
Director, Medical Staff Services

- D. Distribution and Training Requirements
 - 1. This policy resides in the Medical Staff Manuals of both hospitals.
 - 2. New documents or any revised documents will be distributed to Administrative Manual holders. The department/unit/clinic manager will be responsible for communicating this information to the applicable staff.

- E. Review and Renewal Requirements
This policy will be reviewed and/or revised every three years or as required by change of law or practice.

- F. Review and Revision History - SOM
 June 2022 -N. Gesundheit, MD Senior Associate Dean of Medical Education, Stanford University School of Medicine
 James Lau, MD, Assistant Dean for Clerkship Education, SOM, 2/14/19
 Sue Fernandes, MSPA Program Director, 2/15/19
 October 2003, E. Wolfe, MD, N. Gesundheit, MD, L. Shuer, MD, H. Cohen, MD, Stanford University School of Medicine; J. Hall, RNC, Compliance Department, C. Klove, Chief Compliance Officer
 June 2007 Compliance and Privacy Office

- G. Approvals
 QPSEC – 4/10
 SHC MEC 5/10, 4/13, 12/15, 2.19, 7/22, 4/25
 SHC Board 5/10,4/13, 12/15, 2/19, 7/22, 4/25