Physician Assistant
HB 2584 (2025) Frequently Asked Questions
Updated August 4, 2026

Independent Practice

1. **Is a physician assistant allowed to practice independently in Oklahoma?**
   Pursuant to HB 2584 , effective August 29, 2025, physician assistants, who have provided the Medical Board with verification of 6,240 hours of postgraduate clinical practice experience on the appropriate forms, and the 6,240 hours have been verified by the Board, may practice without physician supervision. Physician assistants not practicing under a practice agreement may prescribe medical supplies, services, and drugs, including controlled medications in Schedules III through V.

2. **What is the process for a PA obtaining independent practice?**
   Physician assistants with 6,240 hours of postgraduate clinical experience are eligible to practice independently of a delegating physician. The PA must complete and submit a Form 6 – Physician Assistant Application to Practice Independently of a Delegating Physician. This form can be found at the following link, https://www.okmedicalboard.org/physician_assistants#forms-resources.
   A physician assistant cannot practice independently of a delegating physician until all postgraduate clinical experience hours are verified by Board staff. The PA will be notified once the hours are verified. Once processed, the physician assistant information will be added to the list of PAs authorized for Independent Practice under the terms of Oklahoma House Bill 2584.

3. **Is there a required form to submit the required hours for independent practice?**
   The form 6 – PA Application to Practice Without a Delegating Physician must be completed and submitted to licensing@medicalboard.ok.gov. Once verification of 6,240 or more hours has been reviewed and verified, the physician assistant will be emailed a Practice Location form to complete and submit to licensing@medicalboard.ok.gov.

4. **What does clinical practice experience mean?**
   - Performing medical services related directly to patient care
   - Providing instruction to physician assistants at an institution accredited by the Accreditation Review Commission on Education for the Physician Assistant. Time spent preparing to provide instruction or performing administrative tasks related to providing instruction is not clinical practice.

5. **Does the time spent preparing to provide instruction or performing administrative tasks related to providing instruction count toward the 6,240 hours?**
   No, only providing instruction to physician assistants at an institution accredited by the Accreditation Review Commission on Education for the physician assistant counts toward the required 6,240 hours. Time spent preparing to provide instruction or performing administrative tasks related to providing instruction is not clinical practice.

6. **I currently practice under a delegating physician, but I have obtained 6,240 hours of postgraduate clinical hours, do I have to practice independently?**
   No, if you have obtained 6,240 hours and would like to still practice under supervision of a delegating physician, nothing prohibits you from voluntarily maintaining a practice agreement. Further, your employer may require you to maintain a practice agreement with a physician. Such a requirement by an employer would not be required by statute so it would be considered by the Medical Board to also be voluntary. **If you are practicing under a practice agreement that has changed,** it must be filed with the Medical Board within 10 days. All changes to a practice agreement must be filed with the Medical Board within 10 days.

7. **I have not obtained 6,240 hours of postgraduate clinical experience, what are my options?**
   You are required to practice under supervision of a delegating physician and have a practice agreement on file with the Oklahoma Medical Board. Once you have obtained 6,240 hours of postgraduate clinical experience, you may submit your hours to the Medical Board on the approved forms for verification.

Prescribing

8. **Can a physician assistant prescribe Schedule II drugs?**
   Only physician assistants who are supervised by a delegating physician and practicing under a practice agreement on file with the Medical Board may prescribe controlled medications in Schedules II through V. 59 O.S. § 519.6 (E). If the physician assistant practicing under the supervision of a delegating physician plans to prescribe Schedule II drugs an updated practice agreement Form 5 must be submitted. **If a physician assistant prescribes Schedule II controlled dangerous substances, a Form 5 submitted prior to August 29, 2025, is invalid and the physician assistant and delegating physician are noncompliant with the updated law.** Oklahoma Medical Board professionals can use digitized Form 5 after login into their profile - Relationship Dashboard. For DOs, the Form 5 can be found at the following link, https://www.okmedicalboard.org/physician_assistants/download/408/PA_Form_5.pdf .

9. ***New*: If a physician assistant does not have 6,240 hours of postgraduate clinical hours, can the PA prescribe Schedule II drugs?.** Yes. See the answer to Question 8 for the legal requirements.

10. **What are the consequences for a physician assistant and physician for not submitting an updated practice agreement and prescribing Schedule II drugs?**
    Both the physician assistant and the Medical Doctor will be disciplined by the Oklahoma Medical Board for prescribing Schedule II controlled dangerous substances without a current practice agreement on file with the Oklahoma Medical Board.

11. **If the physician who was going to supervise me is restricted from prescribing scheduled drugs or chooses not to prescribe scheduled drugs, can they still supervise me to prescribe Schedule II drugs?** No. If a physician is restricted or does not prescribe Schedule II drugs, they cannot supervise a PA to write for those drugs.

12. **What Scheduled drugs can an independent physician assistant prescribe?**
    Physician assistants who have met the requirement for 6,240 hours, and who are not practicing under a practice agreement may prescribe medications in Schedules III through V. 59 O.S. § 519.6 (D); OAC **§** 435:15-5-10; OAC 435:15-11-1

13. **Updated: Can a physician assistant dispense drugs?**
    No, Physician assistants may not dispense drugs, but may request, receive and sign for professional samples and may distribute professional samples to patients. 59 O.S. § 519.6 (D) & (E) Please also see the relevant statutes for the Oklahoma Pharmacy Act which define dispense 59 O.S. § 353.1.

14. **Updated: Can a physician assistant procure Schedules III-V medications?** No, the federal DEA prohibits the procurement of controlled medications in Schedules III-V by physician assistants. This is federal law and not found in the Oklahoma statutes.

15. **How will Schedule II prescriptive authority status be conveyed to pharmacists?**
The OMB website has a list here which displays those physician assistants who are in compliance with a current practice agreement and have Schedule II prescriptive authority. Schedule II prescriptive authority is specifically linked to the practice address of the physician assistant. If the PA has prescriptive authority at multiple practice addresses each address must be submitted to the OMB, with an updated Form 5. The list is updated nightly.

16. ***New*: Does a physician assistant have to submit a Form 5 for each delegating physician?** Yes. A PA must have a Form 5 on file for each delegating physician. The Form 5 is the practice agreement between the PA and the delegating physician required by 59 O.S. § 519.6(C).

17. **If I am a PA practicing under prescriptive authority at multiple locations, do I submit separate Form 5s?** No, if it is the same delegating physician, you will submit **one form 5,** with an attached sheet that contains all your practice locations. Please note that if you are with a practice group that has multiple locations and you will be prescribing at multiple locations that those need to be listed in the OMB database. Pharmacies will not fill Schedule II prescriptions if the location of the prescription and your practice location do not match.

18. **Will prescriptive authority status for Schedules III-V be conveyed to pharmacists?**
No, all PAs can prescribe Schedules III-V unless they are restricted by an order of the OMB or limited by their practice agreement. OMB will not post a list for Schedule III-V prescriptive authority.

19. **Can physician assistants request, receive, and sign for professional samples?**
Yes, all physician assistants may request, receive, and sign for professional samples and may distribute professional samples to patients.

20. **What will be displayed on the OBNDD registration?**
HB2584 does not materially amend 63 O.S 2-312E for purposes of what OBNDD will display on a PA's OBNDD registration. The Uniform Controlled Dangerous Substances Act (UCDSA) authorizes PAs to write and administer Schedule II and MD Board statutes and rules restrict that further. If any PAs currently do not have Schedule II prescriptive authority, they can renew with Schedule II with OBNDD. Should any orders or conditions prohibit the physician assistant from having authority for one schedule or another this would still apply. Further questions for OBNDD on registration for prescribing should be addressed to obnddregistration@obn.ok.gov

General Questions

21. **If I'm required to have an agreement, how often do I need to update my practice agreement with the Medical Board?** Each time your supervision **or** your practice address changes. When you add or remove a delegating physician or add or remove a practice address you **shall** update your practice agreement. The Board must receive the Form 5 verifying the practice agreement within ten (10) business days of execution. You shall also update your practice agreement each time the method of supervision changes. For example, if the method of supervision changes from in-person to telemedicine, the practice agreement shall be updated and submitted to the OMB.

22. **I have an old practice agreement (Form 5) on file with the Board, but I want to be able to prescribe Schedule II drugs. Does my current practice agreement need to be updated?**
HB 2584 requires the practice agreement to include the scope of and any limitation on prescribing. You need to

complete a new practice agreement for each delegating physician for whom you plan to prescribe Schedule II drugs. ***The old Form 5 is not compliant with the updated law for Schedule IIs and should not be submitted.*** 59 O.S. § 353.1a; OAC § 435:15-5-10

23. **Is there a fee to update my practice agreement (Form 5)?**
    No, the State Board of Medical Licensure and Supervision shall not charge a fee for filing practice agreements or amendments to practice agreements. 59 O.S. § 519.6 (C)(1)

24. **Is the practice agreement (Form 5) updated?**
    Yes, the Physician Assistant Delegating Practice Agreement was updated August 1, 2025. Please use this version as any version prior to August 1, 2025 is outdated.
    Oklahoma Medical Board professionals can use digitized Form 5 after login into their profile - Relationship Dashboard.

25. **How do I update my practice agreement with the Medical Board** You must email the Form 5 to licensing@medicalboard.ok.gov for processing within ten (10) days of execution.

26. **I want to practice independently. Do I need to obtain malpractice insurance?**
    Physician assistants practicing independently are required to carry malpractice or demonstrate proof of financial responsibility. The minimum amount is one million dollars ($1,000,000.00) per occurrence and three million dollars ($3,000,000.00) aggregate per year. In the rules adopted by the Medical Board, the physician assistant will maintain proof of insurance and will be required to produce proof upon request.
    59 O.S., § 519.6(H)(1)

27. **Are there any exceptions to the requirement for malpractice insurance for independent physician assistants?**
    Yes. A physician assistant employed by or under contract with a federal agency that carries malpractice insurance on behalf of the physician assistant is deemed to be in compliance with the insurance requirement.
    59 O.S., § 519.6(H)(2)

28. **If I am practicing under supervision of a delegating physician, am I required to obtain malpractice insurance?**
    No, only physician assistants who practice independently are required to maintain malpractice insurance.

29. **Do I provide the Oklahoma Medical Board with proof of my malpractice insurance now?**
    No, the physician assistant is not required to provide verification of insurance or proof of financial responsibility to the Board but shall produce it upon request.

30. **With the law changes in 2025 giving advanced practice registered nurses and physician assistants independent authority, are physicians still required to follow the limit of supervising six (6) advanced practice registered nurses and physician assistants?**
    Yes. Any advanced practice registered nurse or physician assistant who is supervised under a practice agreement will count towards the limit of six (6) that a physician may supervise, even if the practice agreement is voluntary.
    OAC 435:10-13-2

31. **What new information is listed on OMB's website regarding a physician assistant and HB 2584?**
    Once a physician assistant's postgraduate clinical experience hours (6,240) are verified by Board staff, the physician assistant is listed as "Fully Licensed-Independent Practice." You can find the published list of independent practice physician assistants here.
    OMB lists each practice address provided by a physician assistant. OMB indicates if the physician assistant is permitted to practice without supervision at a particular address. OMB also indicates on published list if the physician assistant is authorized to prescribe Schedule II medications at a particular address.

32. **If I am a PA practicing under supervision, does my physician need to be in the same specialty practice?**
Yes, OAC 435: 10-13-2(a)(4) requires the physician to be trained in the field of the PA's specialty. The OMB will be reviewing the specialty, not subspecialty, if an issue of compliance occurs.

33. **If I am a PA practicing under supervision, what do I need to have my physician document that counts towards supervision?** "Supervision" means overseeing or delegating the activities of the medical services rendered by a physician assistant through a practice agreement between a medical doctor or osteopathic delegating physician performing procedures or directly or indirectly involved with the treatment of a patient, and the physician assistant working jointly toward a common goal of providing services. Delegation shall be defined by the practice agreement. The physical presence of the delegating physician is not required if the delegating physician and physician assistant are or can be easily in contact with each other by telecommunication. At all times a physician assistant required to practice under supervision shall be considered an agent of the delegating physician.

Workers' Compensation

34. **If a PA is performing work subject to the Workers Compensation Commission, is he or she required to be supervised by a delegating physician?**
HB 2584 did not address workers compensation cases specifically. In reviewing the Oklahoma Workers Compensation Commission (OWCC) 2025 Handbook, the definition of "prescribing doctor" includes "physician assistant to whom a physician has delegated authority." If a PA is prescribing Schedule II controlled medications, they also follow the law regarding mandatory supervision by a delegating physician. HB 2584 does not automatically negate the rules or handbook of the OWCC. If you are a PA working performing work subject to the OWCC, you should request clarification from the OWCC. Please email OWCC at Becky.Foreman@wcc.ok.gov. or call Becky Foreman, Commission Medical Services Liaison phone (405) 522-8418.