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July 15, 1999

Ruth D. Dunnewold, Counsel
State Board of Occupational Therapy Education
And Licensure
116 Pine St.
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Harrisburg, PA 17105-2649

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Secretary

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Executive Vice President

Re: Pennsylvania Bulletin Volume 29 – June 19, 1999, State Board of Occupational
Therapy Education and Licensure Proposed Regulations re: Oral Orders

Dear Ms. Dunnewold:

I am writing as President of the Pennsylvania Medical Society to comment on the above
captioned proposed regulation.

Section 42.25(b) relates to the requirements for countersignature of the physician or podiatrist
who gave the oral order. The Medical Society believes that the regulation, as written, would
cause a problem in a private office setting. There could be situations where the site of
occupational therapy is independent of the prescribing physician's or podiatrist's office.
There would be no occasion for that physician or podiatrist to visit the occupational therapist
for the purpose of countersigning.

It would seem to make more sense to permit use of a faxed or mailed copy of the order to be
sent after the order is given orally. Another way of confirming accuracy is to suggest
guidelines for the transmission of oral orders or permit use of prearranged standing orders.
These suggested alternatives seem preferable to an arbitrary time limit and would do more to
assure accuracy of oral treatment orders.

The remainder of subsection (b) is satisfactory since it would require the same verification
process as for other treatment services orally ordered in a health care facility licensed by the
Department of Health (DOH).

On behalf of the Pennsylvania Medical Society, I would like to thank you for the opportunity
to comment on this proposed regulation.

Sincerely,

John W. Lawrence, MD
President

Cc: Independent Regulatory Review Commission

DNM/doc/cor/Dunnewold