

PANPHA RECEIVED

2003 OCT 20 AM 9:39
3900 Bent Creek Boulevard
Mechanicsburg, PA 17050

INDEPENDENT REGULATORY
REVIEW COMMISSION

Original 2031

October 16, 2003

Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Oral Orders Final Regulation

Dear Commissioners:

PANPHA is very pleased to support the final regulations distributed by the State Board of Nursing on October 8, 2003 to authorize licensed practical nurses (LPNs) to accept oral orders.

It is not news to you that long-term care providers are challenged to recruit and retain qualified staff. PANPHA has identified over 50 recommendations that would help our members in this area of workforce need. While many initiatives are not public policy related there are several that are in the public policy arena, allowing LPNs to take oral orders being one of them.

PANPHA has supported in the past and continues to support changes to the State Board of Nursing regulations that will allow LPNs to accept orders. PANPHA believes that LPNs are adequately trained to administer medications and take oral orders.

Again, thank you for the opportunity to comment on these final regulations. Please contact me if you have any questions.

Sincerely,



Ronald L. Barth
President/CEO

ron@panpha.org

cc: Martha Brown, Esq., State Board of Nursing

RECEIVED

2003 NOV 19 AM 9:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

EMBARGOED MATERIAL

November 12, 2003

Mr. John McGinley, Jr.
Chairperson
Independent Regulatory Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

Dear Mr. McGinley:

The Family Practice Center, P.C. of Central Pennsylvania appreciates the opportunity to comment on the State Board of Nursing final-form rulemaking which addresses the acceptance of oral orders by Licensed Practical Nurses (16 A-5115).

During these challenging times with work force shortages and particularly nursing shortages, it is in the best interest of the patients to allow qualified nurses to accept oral orders in order to facilitate the delivery of safe, effective, timely quality care. Having these provisions in regulation will clear up any disparity with regard to the acceptance of oral orders by LPNs in the nursing home facility setting.

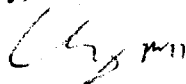
The Family Practice Center, P.C. of Central Pennsylvania supports the State Board of Nursing Regulation, 16 A-5115, which would permit LPNs to accept orders for patient care from qualified practitioners. This regulation is very important to nursing facility providers to assure that our residents receive the best quality care possible in a timely manner. In most facilities, due to the nature of staffing patterns that is most appropriate for this care setting, the LPN has a strong role in care planning, and is often the first line of communication with physicians (or other health care practitioner responsible for the management of the patient's overall care). We believe giving verbal orders directly to the nurse most involved in the care of a resident is likely to actually reduce the potential for medical errors.

For the past several years, this regulation has been proposed and moved through the regulatory process, but has failed to gain final approval for a variety of reasons. Of particular concern was the extent of LPN education in the area of pharmacology and the taking of oral orders. Following a thorough review of this issue, the board determined that "LPNs currently receive adequate instruction in pharmacology and critical thinking skills to render the prohibition against the receipt of oral orders other ^{than} in urgent circumstances outdated a barrier to the delivery of safe and timely health care." The regulation has cleared all the jurisdictions of review, and now requires legislative approval.

As you know, the regulation must be promulgated as final within a period of two years from the date of filing as proposed, which is December 1, 2003. Since issues of concern have been resolved and all stakeholder groups (Pennsylvania Association of County Affiliated Homes, Pennsylvania State Nurses Association, PANPHA, The Hospital & Healthsystem Association of Pennsylvania, Pennsylvania Health Care Association, and the Pennsylvania Medical Directors Association) are in agreement with the final changes, it is imperative that the regulation be approved in order to meet the time frames under the IRRC act.

We are committed to ensuring access to quality care and we offer our complete cooperation and assistance in whatever capacity is needed to effectively implement these important regulations.

Sincerely,



Charles C. Pagana, M.D.

psr

IRRC #2231
State Board of Nursing
Title: Oral Orders

(Embargoed Mail - Form E)		
NAME	ADDRESS	DATE of CORRESPONDENCE
James E. Chlebowski	Family Practice Center, P.C.	11/12/2003
Kevin E. Shafer	Family Practice Center, P.C.	11/12/2003
Kenneth Erdman, D.O.	Family Practice Center, P.C.	11/12/2003
Charles P. Fasano D.O., President	Family Practice Center, P.C.	11/12/2003
Edward G. Dempsey, D.O.	Family Practice Center, P.C.	11/12/2003
Kathleen E. Horne, D.O.	Family Practice Center, P.C.	11/12/2003
Lynn G. Guiser, M.D.	Family Practice Center, P.C.	11/12/2003
D. Bradley Gray, D.O.	Family Practice Center, P.C.	11/12/2003
Angela Klinger, D.O.	Family Practice Center, P.C.	11/12/2003
Gene W. Reisinger, D.O.	Family Practice Center, P.C.	11/12/2003
Vikas Passi, M.D.	Family Practice Center, P.C.	11/12/2003



Rose View Center

Genesis ElderCare® Network

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2003 NOV 19 AM 9: 15

INDEPENDENT REGULATORY
REVIEW COMMISSION

EMBARGOED MATERIAL

1201 Rural Avenue
Williamsport, PA 17701
Tel 570 323 4340
Fax 570 323 0836

November 6, 2003

IRRC
14th Floor 333 Market Street
Harrisburg, PA 17101

Dear Mr. Sandusky,

I am writing to ask your support for State Board of Nursing Regulation, 16 A-51 15, which would permit licensed practical nurses (LPNs) to accept oral orders for patient care from a qualified practitioner. During these challenging times of nursing shortages, it is in the best interest of patients to allow qualified LPNs to accept oral orders in order to facilitate the delivery of safe, effective, timely quality care.

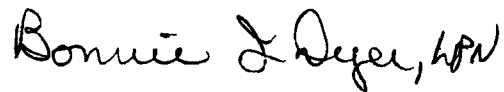
This regulation is very important to nursing facility providers to assure that our residents receive the best quality care possible in a timely manner. In most facilities, due to the nature of staffing patterns that are most appropriate for this care setting, the LPN has a strong role in care planning, and is often the first line of communication with physicians (or other health care practitioner responsible for the management of the patient's overall care).

For the past several years, this regulation has been proposed, and moved through the regulator process, but has failed to gain final approval for a variety of reasons. Of particular concern were the extent of LPN education in the area of pharmacology and the taking of oral orders. Following a thorough review of this issue, the board determined that "LPNs currently receive adequate instruction in pharmacology and critical thinking skills to render the prohibition against the receipt of oral orders other than in urgent circumstances outdated and a barrier to the delivery of safe and timely health care." The regulation has cleared all other jurisdictions of review, and now requires legislative approval. I am asking for your support of State Board of Nursing Regulation 16 A-51 15.

As you know, the IRRC act requires the regulation to be promulgated as final within a period of two years from the date of filing as proposed, which is December 1, 2003. Since issues of concern have been resolved and all stakeholder groups (Pennsylvania Association of County Affiliated Homes, Pennsylvania State Nurses Association, PANPHA, The Hospital & Healthsystem Association of Pennsylvania, Pennsylvania Health Care Association, and the Pennsylvania Medical Directors Association) are in agreement with the final changes, it is imperative that the legislative committees and the full legislature approve the regulation in order to meet the time frames under the IRRC act.

Your support of this measure would be greatly appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie L. Dyer, L.P.N." The signature is written in black ink and is positioned above the typed name.

Bonnie Dyer, L.P.N.

Original: 2231



UNIVERSITY OF
PENNSYLVANIA
HEALTH SYSTEM

RECEIVED

2003 NOV 18 AM 9:23

Penn Medicine at Radnor

November 5, 2003

INDEPENDENT REGULATORY
REVIEW COMMISSION

Mr. John McGinley, Jr.
Chairperson
Independent Regulatory Review Commission
333 Market Street
14th floor
Harrisburg, PA 17101

Dear Mr. McGinley:

I am a Geriatric Medicine specialist at the University of Pennsylvania and a long-term care specialist. I have served as Medical Director of twelve Pennsylvania nursing homes over the last ten years, and currently I am Medical Director of six. I serve as Chair of the Geriatric Medicine Division's Long-term Care Group at Penn, and I would like to urge you to support passage of the State Board of Nursing final-form rulemaking which address the acceptance of oral orders by Licensed Practical Nurses (16 A-5115).

The nursing shortage and the staffing crisis in long-term care facilities makes imperative the passage of the final rule allowing qualified nurses to accept oral orders in order to facilitate the delivery of safe, effective, and timely quality care. Our Long-term Care Group at Penn supports the State Board of Nursing Regulation, 16 A-5115, which would permit LPNs to accept oral orders for patient care from a qualified practitioner. This regulation is very important to nursing facility providers to assure that our residents receive the best quality care possible in a timely manner.

In most facilities, due to the nature of staffing patterns that are most appropriate for this care setting, the LPN has a strong role in care planning, and is often the first line of communication with physicians (or other health care practitioner responsible for the management of the patient's overall care). We believe giving verbal orders directly to the nurse most involved in the care of a resident is likely to actually reduce the potential for medical errors.

We are committed to ensuring access to quality care and we offer our complete cooperation and assistance in whatever capacity is needed to effectively implement these important regulations. I thank you for considering our opinion regarding this important issue.

Sincerely,

A handwritten signature in black ink that reads "Thomas Lawrence MD".

Thomas Lawrence, MD, CMD
Clinical Assistant Professor of Medicine *for the Penn Long-term Care Group*

Original: 2231

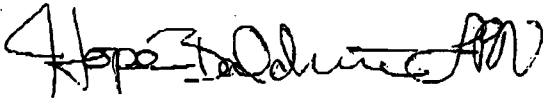
IRRC
14th Floor 333 Market Street
Harrisburg, PA 17101

November 5, 2003

To Whom It May Concern:

I am in support of the proposed regulation to approve LPN to receive verbal orders. This is a necessary step in the process of providing quality care to your constituents.

Sincerely,



RECEIVED
2003 NOV -5 AM 10:34
REVIEW COMMISSION



IRRC #2231
State Board of Nursing
Title: Oral Orders

(Form D)		
NAME	ADDRESS	DATE of CORRESPONDENCE
Hope Baldwin		11/5/03
Arlene Homa		11/5/03
Kirk Oyrl		11/5/03
Demo Hill		11/5/03
Sandy Bennighoff		11/5/03
Allison Kline		11/5/03



Birchwood
Nursing & Rehabilitation Center

395 Middle Road
Nanticoke, PA 18634
(570) 735-2973
Fax: (570) 735-8420

November 5, 2003

Mr. Sandusky
IRRC
14th Floor 333 Market Street
Harrisburg, PA 17101

RECEIVED

2003 NOV 19 AM 9:18

INDEPENDENT REGULATORY
REVIEW COMMISSION

EMBARGOED MATERIAL

Dear Mr. Sandusky:

I am writing to ask your support for State Board of Nursing Regulation, 16 A-51 15, which would permit licensed practical nurses (LPNs) to accept oral orders for patient care from a qualified practitioner. During these challenging times of nursing shortages, it is in the best interest of patients to allow qualified LPNs to accept oral orders in order to facilitate the delivery of safe, effective, timely quality care.

This regulation is very important to nursing facility providers to assure that our residents receive the best quality care possible in a timely manner. In most facilities, due to the nature of staffing patterns that are most appropriate for this care setting, the LPN has a strong role in care planning, and is often the first line of communication with physicians (or other health care practitioners responsible for the management of the patient's overall care).

For the past several years, this regulation has been proposed and moved through the regulatory process, but has failed to gain final approval for a variety of reasons. Of particular concern were the extent of LPN education in the area of pharmacology and the taking of oral orders. Following a thorough review of this issue, the board determined that "LPNs currently receive adequate instruction in pharmacology and critical thinking skills to render the prohibition against the receipt of oral orders other than in urgent circumstances outdated and a barrier to the delivery of safe and timely health care." The regulation has cleared all other jurisdictions of review, and now requires legislative approval. I am asking for your support of State Board of Nursing Regulation 16 A-51 15.

As you know, the IRRC act requires the regulation to be promulgated as final within a period of two years from the date of filing as proposed, which is December 1, 2003. Since issues of concern have been resolved and all stakeholder groups (Pennsylvania Association of County Affiliated Homes, Pennsylvania State Nurses Association, PANPHA, The Hospital & Healthsystem Association of Pennsylvania, Pennsylvania Health Care Association and the Pennsylvania Medical Directors Association) are in agreement with the final changes, it is imperative that the legislative committees and the full legislature approve the regulation in order to meet the time frames under the IRRC act.

Your support of this measure would be greatly appreciated.

Sincerely,

Birchwood Nursing and Rehabilitation Center Nursing Staff



PENNSYLVANIA MEDICAL DIRECTORS
ASSOCIATION



EMBARGOED MATERIAL

RECEIVED

2003 NOV 20 AM 9:01

November 5, 2003

INDEPENDENT REGULATORY
REVIEW COMMISSION

Mr. John McGinley, Jr.
Chairperson
Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

Dear Mr. McGinley:

The Pennsylvania Medical Directors Association appreciates the opportunity to comment on the State Board of Nursing final-form rulemaking which addresses the acceptance of oral orders by Licensed Practical Nurses (16 A-5115). The Pennsylvania Medical Directors Association (PMDA) is the official state chapter of the American Medical Directors Association, and represents physicians practicing in the long-term care setting. The mission of PMDA is to improve the quality of care for Pennsylvania's long-term residents.

During these challenging times with workforce shortages, and particularly nursing shortages, it is in the best interest of patients to allow qualified nurses to accept oral orders in order to facilitate the delivery of safe, effective, timely quality care. Having these provisions in regulation will clear up any disparity with regard to the acceptance of oral orders by LPNs in the nursing facility setting.

PMDA supports the State Board of Nursing Regulation, 16A-5115, which would permit LPNs to accept oral orders for patient care from a qualified practitioner. This regulation is very important to nursing facility providers to assure that our residents receive the best quality care possible in a timely manner. In most facilities, due to the nature of staffing patterns that are most appropriate for this care setting, the LPN has a strong role in care planning, and is often the first line of communication with physicians (or other health care practitioner responsible for the management of the patient's overall care). We believe giving verbal orders directly to the nurse most involved in the care of a resident is likely to actually reduce the potential for medical errors.

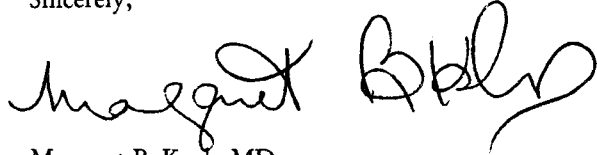
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As you know, the regulation must be promulgated as final within a period of two years from the date of filing as proposed, which is December 1, 2003. Since issues of concern have been resolved and all stakeholder groups (Pennsylvania Association of County Affiliated Homes, Pennsylvania State Nurses Association, PANPHA, The Hospital and Healthsystem Association of Pennsylvania, Pennsylvania Health Care Association, and the Pennsylvania Medical Directors Association) are in agreement with the final changes, it is imperative that the regulation be approved in order to meet the time frames under the IRRC act.

NOVEMBER 5, 2003

We are committed to ensuring access to quality care and we offer our complete cooperation and assistance in whatever capacity is needed to effectively implement these important regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Margaret B. Kush". The signature is written in a cursive style with a large, stylized initial "M".

Margaret B. Kush, MD
Survey Consistency Committee Chair



University of Pittsburgh

School of Medicine
Department of Medicine - Division of Geriatric Medicine

Kaufmann Medical Building, Suite 500
3471 Fifth Avenue
Pittsburgh, Pennsylvania 15213
412-692-2360
Fax: 412-692-2370

Original: 2231

October 31, 2003

Mr. John McGinley, Jr.
Chairperson
Independent Regulatory Review Commission
333 Market Street - 14th floor
Harrisburg, PA 17101

RECEIVED
2003 NOV -5 AM 9:56
STATE BOARD OF NURSING

Dear Mr. McGinley:

The Division of Geriatric Medicine of the University of Pittsburgh and University of Pittsburgh Institute on Aging appreciates the opportunity to comment on the State Board of Nursing final-form rulemaking which address the acceptance of oral orders by Licensed Practical Nurses (16 A-5115).

During these challenging times with workforce shortages, and particularly nursing shortages, it is in the best interest of patients to allow qualified nurses to accept oral orders in order to facilitate the delivery of safe, effective, timely quality care. Having these provisions in regulation will clear up any disparity with regard to the acceptance of oral orders by LPNs in the nursing facility setting.

We support the State Board of Nursing Regulation, 16 A-5115, which would permit LPNs to accept oral orders for patient care from a qualified practitioner. This regulation is very important to nursing facility providers to assure that our residents receive the best quality care possible in a timely manner. In most facilities, due to the nature of staffing patterns that are most appropriate for this care setting, the LPN has a strong role in care planning, and is often the first line of communication with physicians (or other health care practitioner responsible for the management of the patient's overall care). We believe giving verbal orders directly to the nurse most involved in the care of a resident is likely to actually reduce the potential for medical errors.

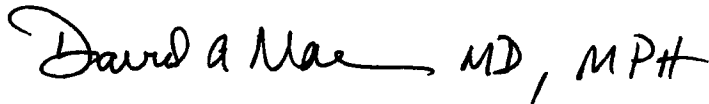
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Mr. John McGinley, Jr.
Page 2
October 31, 2003

As you know, the regulation must be promulgated as final within a period of two years from the date of filing as proposed, which is December 1, 2003. Since issues of concern have been resolved and all stakeholder groups (Pennsylvania Association of County Affiliated Homes, Pennsylvania State Nurses Association, PANPHA, The Hospital & Healthsystem Association of Pennsylvania, Pennsylvania Health Care Association, and the Pennsylvania Medical Directors Association) are in agreement with the final changes, it is imperative that the regulation be approved in order to meet the time frames under the IRRC act.

We are committed to ensuring access to quality care and we offer our complete cooperation and assistance in whatever capacity is needed to effectively implement these important regulations.

Sincerely,

A handwritten signature in black ink that reads "David A. Nace MD, MPH". The signature is written in a cursive style with a large initial "D".

David A. Nace, MD, MPH
Director of Long-Term Care
Division of Geriatric Medicine
University of Pittsburgh Institute on Aging

DAN/njk

- c: Lisa Boscola, Minority Chair, Senate Consumer Protection and Professional Licensure Committee
- Thomas Gannon, Chairman, House Professional Licensure Committee
- William Rieger, Minority Chair, House Professional Licensure Committee
- Robert Tomlinson, Chair, Senate Consumer Protection and Professional Licensure Committee

IRRC

Original: 2231

From: jstone@clearfieldhosp.org
Sent: Friday, October 31, 2003 11:33 AM
To: IRRC
Subject: 16A-5115 Oral Orders

With the DOH implementation of The Patient Safety Act XIII, careful review of all medication errors is occurring in every facility in Pennsylvania. The data is being submitted to DOH and, eventually, it will go to the Patient Safety Authority. The Patient Safety Authority will trend the data and issue analysis. It is obvious that medication errors occur when verbal orders are given. It is premature to expand the ability to receive verbal orders when we do not have data to support what constitutes safe practice. Medication errors cause significant patient harm. Since there is a mechanism in place to provide information about current practice and it's impact on errors, it would seem wise to wait until the Patient Safety Authority can provide guidance before expanding the privilege.

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2003 OCT 31 PM 2:22

REVIEW COMMISSION

Original 2231

315 North Second Street / Harrisburg, Pennsylvania 17101 / (717) 221-1800 / FAX (717) 221-8687



OFFICERS

HEATHER STAMM VASSA, NHA
Quakertown, PA
Chair of the Board

KRISTINE LOWTHER, NHA
Camp Hill, PA
First Vice Chair of the Board

LEE TINKEY, NHA, RHFP
Hershey, PA
Secretary/Treasurer

ALAN G. ROSENBLUM
Harrisburg, PA
President and CEO

October 28, 2003

VIA FAX

Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: LPN Oral Orders Regulation 16 A-51 15

To Whom it May Concern:

On behalf of the more than 300 members of the Pennsylvania Health Care Association and the Center for Assisted Living Management (collectively, "PHCA"), I write to encourage the Commission's final approval for State Board of Nursing Regulation, 16 A-51 15, which would permit licensed practical nurses (LPNs) to accept oral orders for patient care from a qualified practitioner. As you undoubtedly recognize, Pennsylvania faces a daunting shortage of nurses that encompasses not only registered nurses, but licensed practical nurses and nurses aides as well. In such challenging times, we strongly believe that it is in the best interest of patients to allow qualified nurses to accept oral orders in order to facilitate the delivery of safe, effective and timely care.

In particular, and as you undoubtedly recognize, final publication of State Board of Nursing (Board) Regulation, 16 A-51 15, which would permit Licensed Practical Nurses (LPNs) to accept oral orders for patient care from a qualified practitioner, must be acted on by December 1, 2003 or the regulatory process must begin anew. Such a delay would be particularly devastating to long term care providers.

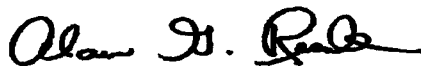
Since issues of concern have been resolved and all stakeholder groups (Pennsylvania Association of County Affiliated Homes, Pennsylvania State Nurses Association, PANPHA, Hospital & Healthsystem Association of Pennsylvania, Pennsylvania Medical Directors Association and PHCA) have agreed to the final changes, it is imperative that the Independent Regulatory Review Commission (IRRC) support final approval of these regulations in order to meet the time frames under the IRRC act.

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2003 OCT 28 PM 4:18
INDEPENDENT REGULATORY REVIEW COMMISSION

Independent Regulatory Review Commission
October 28, 2003
Page 2

We are confident that the IRRC will act expeditiously regarding these regulations and appreciate your commitment to this issue. If you require any additional information, please feel free to contact me.

Sincerely,



Alan G. Rosenbloom
President and CEO

AGR/jlh



Fax Cover Sheet

Date: October 28, 2003

To: IRRC
717-783-2664 FAX

From: Alan Rosenbloom, President & CEO
Phone: 717-221-7925 · Fax: 717-221-8690
E-mail: arosenbloom@phca.org

Re: LPN Oral Orders Regulation 16 A-51 15

Number of Pages
(Including cover): 3

Message: Please see the attached letter.

RECEIVED
 2003 OCT 28 PM 4: 18
 DIRECTOR'S COMMISSION

This email and any attachments may contain information that is confidential, proprietary, privileged or otherwise protected by law. The information is solely intended for the named addressee(s)[or person responsible for delivering it to the addressee(s)]. If you are not the intended recipient of this message, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this e-mail in error, please notify the sender immediately by return e-mail and delete it from your computer. Thank you.



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2003 NOV -3 AM 9:21

INDEPENDENT REGULATORY
REVIEW COMMISSION

Original: 2231

Pennsylvania Medical Directors Association

We are Pennsylvania's association for long-term care medicine.

October 30, 2003

Mr. John McGinley, Jr.
Chairperson
Independent Regulatory Review Commission
333 Market Street
14th floor
Harrisburg, PA 17101

Dear Mr. McGinley:

The Pennsylvania Medical Directors Association appreciates the opportunity to comment on the State Board of Nursing final-form rulemaking, which address the acceptance of oral orders by Licensed Practical Nurses (16 A-5115). The Pennsylvania Medical Directors Association (PMDA) is the official state chapter of the American Medical Directors Association, and represents physicians practicing in the long-term care setting. The mission of PMDA is to improve the quality of care for Pennsylvania's long-term care residents.

During these challenging times with workforce shortages, and particularly nursing shortages, it is in the best interest of patients to allow qualified nurses to accept oral orders in order to facilitate the delivery of safe, effective, timely quality care. Having these provisions in regulation will clear up any disparity with regard to the acceptance of oral orders by LPNs in the nursing facility setting.

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President

David A. Nace, MD, MPH
Pittsburgh, 412-692-4200

President-Elect

Sefi R. Knoble, MD, CMD, FACP
Philadelphia, 215-581-0705

Immediate Past President

Glenn M. Panzer, MD, CMD
Luzerne, 570-287-3131

Treasurer

Daniel R. Steiner, MD, CMD
Oakmont, 412-826-9229

Secretary

Daniel Haimowitz, MD, CMD, FACP
Levittown, 215-943-2222



Board of Directors

Noel H. Ballentine, MD—Hershey
J. Kenneth Brubaker, MD, CMD—Elizabethtown
Jose P. George, MD, CMD—Allison Park
Thomas E. Lawrence, MD, CMD—West Chester
Robert M. Pfoff, MD—Warrendale
Marc H. Zisselman, MD—Philadelphia

Administrative Office

777 East Park Drive • P.O. Box 8820
Harrisburg, PA 17105-8820
Phone: 717-558-7868
FAX: 717-558-7841
pmda@pamedsoc.org
www.pmda.org

Executive Director

Charlene M. Wandzilak

circumstances outdated and a barrier to the delivery of safe and timely health care.” The regulation has cleared all other jurisdictions of review, and now requires legislative approval.

As you know, the regulation must be promulgated as final within a period of two years from the date of filing as proposed, which is December 1, 2003. Since issues of concern have been resolved and all stakeholder groups (Pennsylvania Association of County Affiliated Homes, Pennsylvania State Nurses Association, PANPHA, The Hospital & Healthsystem Association of Pennsylvania, Pennsylvania Health Care Association, and the Pennsylvania Medical Directors Association) are in agreement with the final changes, it is imperative that the regulation be approved in order to meet the time frames under the IRRC act.

We are committed to ensuring access to quality care and we offer our complete cooperation and assistance in whatever capacity is needed to effectively implement these important regulations.

Sincerely,

David A. Nace, MD, MPH

David A. Nace, MD, MPH
President
Pennsylvania Medical Directors Association

cc: Lisa Boscola, Minority Chair, Senate Consumer Protection and Professional Licensure Committee
Thomas Gannon, Chairman, House Professional Licensure Committee
William Rieger, Minority Chair, House Professional Licensure Committee
Robert Tomlinson, Chair, Senate Consumer Protection and Professional Licensure Committee

Original 2231



Laurel Center

Genesis ElderCare® Network

RECEIVED

2003 OCT 31 AM 9:23

INDEPENDENT REGULATORY
REVIEW COMMISSION

125 Holly Road
Hamburg, PA 19526
Tel 610 562 2284
Fax 610 562 0775

October 28, 2003

Richard M Sandusky
Senior Regulatory Analyst
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Mr. Sandusky:

As a registered nurse employed in the Long Term Care industry for twenty-one years, I am well acquainted with the practical applications of our current nursing shortage. That is why I am writing to you to encourage your support of the pending State Board of Nursing Regulation 16 A-51 15. If enacted, this would allow Licensed Practical Nurses (LPN) to receive oral orders from qualified practitioners. This is critically important to the safe delivery of care, especially in the Long Term Care setting. LPN's are often the staff member that communicates with the physician (or other health care practitioner responsible for the management of the patient's overall care) and thus is in the best place to receive oral direction for care.

As you well know, the IRRRC act requires the regulation to be promulgated as final within two years of the date of filing as proposed. For the act in question, this date is December 1, 2003. I urge you to do what is in the scope of your duties to do to promote this regulatory change and empower the LPN's of the Commonwealth of Pennsylvania to accept oral orders in order to be permitted to act more fully in the best interest of those who are under their care.

Yours truly,

Cindy Brandstatter, RN
Staff Development Coordinator



Laurel Center

Genesis ElderCare® Network

RECEIVED

2003 OCT 31 AM 9:22

INDEPENDENT REGULATORY REVIEW COMMISSION

125 Holly Road
Hamburg, PA 19526
Tel 610 562 2284
Fax 610 562 0775

October 28, 2003

Richard M Sandusky
Senior Regulatory Analyst
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, Pennsylvania 17101

Dear Mr. Sandusky:

As a registered nurse employed in the Long Term Care industry for nearly eleven years, I am well acquainted with the practical applications of our current nursing shortage. That is why I am writing to you to encourage your support of the pending State Board of Nursing Regulation 16 A-51 15. If enacted, this would allow Licensed Practical Nurses (LPN) to receive oral orders from qualified practitioners. This is critically important to the safe delivery of care, especially in the Long Term Care setting. LPN's are often the staff member that communicates with the physician (or other health care practitioner responsible for the management of the patient's overall care) and thus is in the best place to receive oral direction for care.

As you well know, the IRRC act requires the regulation to be promulgated as final within two years of the date of filing as proposed. For the act in question, this date is December 1, 2003. I urge you to do what is in the scope of your duties to do to promote this regulatory change and empower the LPN's of the Commonwealth of Pennsylvania to accept oral orders in order to be permitted to act more fully in the best interest of those who are under their care.

Yours truly,

Mary Kathleen Cates, BS, RN
Clinical Reimbursement Coordinator

EMBARGOED MATERIAL

IRRC
333 Market St 14th Floor
Harrisburg, PA 17101

October 25, 2003

IRRC,

I am writing to ask your support for the State Board of Nursing Regulation, 16 A-51 15, which would permit licensed practical nurses (LPNs) to accept oral orders for patient care from a qualified practitioner. During these challenging times of nursing shortages, it is in the best interest of the patient to allow qualified LPNs to accept oral orders in order to facilitate the delivery of safe, effective, timely quality care.

This regulation is very important to nursing facility providers to assure that our residents receive the best quality care possible in a timely manner. In most facilities, due to the nature of staffing patterns that are most appropriate for this care setting, the LPN has a strong role in care planning, and is often the first line of communication with the physician (or other healthcare practitioner responsible for the management of the patients overall care).

For the past several years this regulation has been proposed, and moved through the regulatory process, but has failed to gain final approval for a variety of reasons. Of particular concern were the extent of LPN education in the area of pharmacology and the taking of oral orders. Following a thorough review of this issue, the board determined that "LPNs currently receive adequate instruction in pharmacology and critical thinking skills to render the prohibition against the receipt of oral orders other than in an urgent circumstance outdated and a barrier to the delivery of safe and timely healthcare". The regulation has cleared all other jurisdictions of review, and now requires legislative approval. I am asking for your support of the State Board of Nursing Regulation 16 A-51 15.

As you know, the IRRC act requires the regulation to be promulgated as final within a period of two years from the date of filing as proposed, which is December 1, 2003. Since the issues of concern have been resolved and all stake holder groups (Pennsylvania Association of County Affiliated Homes, Pennsylvania State Nurses Association, PANPHA, The Hospital and Health system Association of Pennsylvania, Pennsylvania Health Care Association, and the Pennsylvania Medical Directors Association) are in agreement with the final changes, it is imperative that the legislative committees and the full legislature approve the regulation in order to meet the time frames under the IRRC act.

Your support of this measure would be greatly appreciated.

Sincerely,

Gerard B. McCurey, RN, BSN

RECEIVED

2003 NOV 20 AM 9:00

INDEPENDENT REGULATORY
REVIEW COMMISSION

Original: 2231

Dear Mr. Sandusky,

I am writing to ask your support for State Board of Nursing Regulation, 16 A-51 15, which would permit licensed practical nurses to accept verbal orders for residents from a qualified practitioner. During this time of nursing shortages, it is in the best interest of our residents to permit qualified LPN's to accept verbal orders to facilitate the delivery of care.

This regulation is extremely important to ensure that our residents receive the best quality of care in a timely manner. The LPN's are often the first to communicate with the attending physicians.

LPN's currently receive instruction in pharmacology and critical thinking skills. This knowledge renders the prohibition against them taking verbal orders other than in urgent circumstances outdated and hinders the delivery of safe and timely health care.

I am asking your support in having the legislature approve State Board of Nursing Regulation 16 A-51 15.

Your support of this measure would be greatly appreciated not only by professional nurses but also by the residents and their families who we care for.

Sincerely,

Jo Ann Lutjenski

RECEIVED

2003 OCT 28 AM 8:44

REVIEW COMMISSION

Dear Mr. Sandusky,

I am writing to ask your support for State Board of Nursing Regulation, 16 A-51 15, which would permit licensed practical nurses to accept verbal orders for residents from a qualified practitioner. During this time of nursing shortages, it is in the best interest of our residents to permit qualified LPN's to accept verbal orders to facilitate the delivery of care.

This regulation is extremely important to ensure that our residents receive the best quality of care in a timely manner. The LPN's are often the first to communicate with the attending physicians.

LPN's currently receive instruction in pharmacology and critical thinking skills. This knowledge renders the prohibition against them taking verbal orders other than in urgent circumstances outdated and hinders the delivery of safe and timely health care.

I am asking your support in having the legislature approve State Board of Nursing Regulation 16 A-51 15.

Your support of this measure would be greatly appreciated not only by professional nurses but also by the residents and their families who we care for.

Sincerely,

Judy Benfer RN

RECEIVED
2003 OCT 30 AM 9:01
STATE BOARD OF NURSING
REVIEW COMMISSION



Dear Mr. Sandusky,

I am writing to ask your support for State Board of Nursing Regulation, 16 A-51 15, which would permit licensed practical nurses to accept verbal orders for residents from a qualified practitioner. During this time of nursing shortages, it is in the best interest of our residents to permit qualified LPN's to accept verbal orders to facilitate the delivery of care.

This regulation is extremely important to ensure that our residents receive the best quality of care in a timely manner. The LPN's are often the first to communicate with the attending physicians.

LPN's currently receive instruction in pharmacology and critical thinking skills. This knowledge renders the prohibition against them taking verbal orders other than in urgent circumstances outdated and hinders the delivery of safe and timely health care.

I am asking your support in having the legislature approve State Board of Nursing Regulation 16 A-51 15.

Your support of this measure would be greatly appreciated not only by professional nurses but also by the residents and their families who we care for.

Sincerely,

Shirley Waage RN

RECEIVED
2009 OCT 28 AM 8:42
NORTH CAROLINA BOARD OF NURSING
REVIEW COMMISSION

IRRC #2231

Agency: State Board of Nursing

Title: Oral Orders

(Form C)

NAME	ADDRESS	DATE of CORRESPONDENCE
Shi L. Walk		10/28/2003
Joanne Stalker		10/28/2003
Claudia Bake		10/28/2003
Mike (btb)		10/28/2003
Cyndy L. Drener		10/28/2003
Patricia Yerkes		10/28/2003
Kathleen Denise		10/28/2003
Lewitt Bonny		10/28/2003
Jo-Ann Gutzinger		10/28/2003