

Original: 2376



**Pennsylvania Association of Nurse Anesthetists
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Harrisburg, PA 17102
800-495-7262**

January 30, 2004

Amy L. Nelson
Board Counsel
State Board of Osteopathic Medicine
P.O. Box 2649
Harrisburg, PA 17105-2649

2004 FEB 11 AM 9:03
RECEIVED COMMISSIONER

Re: Delegation of Medical Services

Dear Ms. Nelson:

The Pennsylvania Association of Nurse Anesthetists opposes the Osteopathic version of the Delegation of Medical Services regulation. The points brought up at the hearings for the Physician Delegation of Medical Services from the State Board of Medicine remain unanswered. Several Representatives on the House Professional Licensure Committee spoke out against the regulation, saying that it did not and still does not define delegation or the specifics of delegation with respect to healthcare practitioners. In addition, those same Representatives objected to the addition of the word technician, who are by and large unlicensed.

The regulation still does not provide objective criteria to determine the knowledge or skill of the physician who may be delegating to an individual with more skill and expertise in that particular matter than the physician. This in itself creates an avenue for liability, increased billing costs, and fraud.

We continue to oppose this form of the regulation and believe that it is driven solely to encroach on the scope of practice of Nurse Anesthetists, Nurse Practitioners, Clinical Nurse Specialists, and all other Advanced Practice Nursing Groups.

Thank you,

Joan Joyce Carl
President, PANA

cc: Commissioner Bob Nyce, IRRC