



Pennsylvania MEDICAL SOCIETY®

September 20, 2006

MARK A. PIASIO, MD
President

*In Memoriam
1932-2005*
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Executive Vice President

Commissioner Alvin C. Bush
Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Commissioner Bush:

We are aware that the Independent Regulatory Review Commission will soon review the State Board of Medicine's revisions to Chapter 16, State Board of Medicine—General Provisions, Subchapter B, General License, Certification and Registration Provisions and Chapter 18, State Board of Medicine—Practitioners Other Than Medical Doctors, Subchapter D, Physician Assistants General Provisions.

The Pennsylvania Medical Society strongly urges you to approve these badly need revisions to the regulations. The Medical Society worked closely with the Pennsylvania Society of Physician Assistants in proposing changes to the existing regulations. We are pleased to note that many of our suggested revisions appear in the proposed amendments.

We stress the importance of approving these regulations as soon as possible in order to allow our members to utilize the talents of physician assistants in a manner more consistent with their level of training and that reflects the current state of medical practice. For example, in the current regulations, at 18.144 (4), the physician assistant supervisor is required to see the patient every third visit or at least once a year. This rule causes much difficulty for physicians who hire physician assistants. It forces the physician to see the patient every third visit even if he or she has a minor problem that the physician assistant can easily handle. In addition, if a patient visits the practice and sees the physician assistant then does not return for more than a year, the practice has technically violated the regulations. One can envision many similar scenarios that would create a violation. The new language in the revised version will remove this difficulty. It allows the supervising physician and the physician assistant to set their own reasonable parameters for when the physician needs to see the patient based upon sound medical judgment and patient request instead of an inflexible requirement.

There exist numerous other examples of revisions that are long overdue. We hope that the Independent Regulatory Review Commission will agree and approve these amendments.

Sincerely,

Mark A. Piasio, MD
President

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Commissioner Alvin C. Bush
September 20, 2006
Page 2

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