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Medical Center

*University of Pittsburgh Physicians
Department of Neurological Surgery*

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INDEPENDENT REGULATORY
REVIEW COMMISSION

UPMC Presbyterian
Suite B-400
200 Lothrop Street
Pittsburgh, PA 15213-2582
412-647-3685
Fax: 412-647-5559

November 14, 2005

Gerald S. Smith
Board Counsel
P.O Box 2649
Harrisburg, PA 17105-2649

L. Dade Lunsford, MD
Chairman

Administration
David J. Bissonette, PA-C, MBA
Assistant Chairman

Proposed Rulemaking: Physician Assistants

Brain Tumors
Douglas Kondziolka, MD
L. Dade Lunsford, MD
Ian F. Pollack, MD
Kevin A. Walter, MD

Dear Mr. Smith:

Clinical Neurophysiology
R. J. Sciabassi, MD, PhD
Chief
Jeffrey Balzer, PhD
Donald J. Crammond, PhD

I have practiced as a physician assistant in the Department of Neurological Surgery for 30 years. My current primary supervisor is L. Dade Lunsford, MD. We utilize 10 physician assistants and 2 nurse practitioners in our group of 19 physicians and 18 neurosurgical residents. I write in support of the proposed changes to Pennsylvania Code Title 49, Chapter 18, relating to physician assistants. The proposed changes are an important reflection of the evolution of clinical utilization of PAs. The proposed rules will allow me and my supervising physicians to more effectively and efficiently care for patients.

Community Based
Michael Rutigliano, MD, MBA

Cranial Nerve Disorders
Amin Kassam, MD
Chief
Michael R. Horowitz, MD

The proposed regulations eliminate redundant, overly restrictive, impractical, and obsolete rules. While the proposed rules streamline the regulation of PA practice, they retain and clarify prudent and rational elements related to supervision, medical orders, prescriptions and reporting requirements. Furthermore, addressing the need for flexible staffing and team deployment is both practical and necessary to meet coverage demands in many medical facilities. Finally, the proposed rules for prescribing and dispensing controlled medications (including schedule II narcotics) and identification in the written agreement of drug categories that a PA may not prescribe will remove a significant barrier to the effective utilization of PAs in pain management, surgery, hospice care and oncology.

Image-Guided
Douglas Kondziolka, MD
L. Dade Lunsford, MD
Ann Maitz, MSc

Pain
John J. Moossy, MD

Pediatric and Epilepsy
A. Leland Albright, MD
Chief
P. David Adelson, MD
Ian F. Pollack, MD

The regulatory revisions are progressive and consistent with provisions adopted in many other states. They provide for good public protection while optimizing the safe utilization of PAs. As a licensed and practicing PA, I urge the Board to adopt these proposed changes. Thank you for your consideration.

Skull Base/Minimally Invasive
Amin Kassam, MD
Michael Horowitz, MD

Spine
William C. Welch, MD
Chief

Peter C. Gerszten, MD, MPH
John J. Moossy, MD
Richard M. Spiro, MD

Sincerely,

Trauma
P. David Adelson, MD

David Bissonette, PA-C, MBA
Assistant Professor

Vascular
Michael B. Horowitz, MD
Amin Kassam, MD