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October 24, 2007

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Charles P. Fasano, D.O.  
Chairman, Osteopathic Board of Medicine  
P.O. Box 2649  
Harrisburg, PA 17105-2649

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Gary Pasqualicchio, DO  
Carrie Knipe, PA-C

Dear Dr. Fasano,

I am writing in regard to the recent proposed regulations to allow osteopathic physicians to delegate prescriptive authority to the physician assistant's they supervise. As you know this was in the recent publication of the Pennsylvania Bulletin on October 20, 2007. The physician assistant profession was developed in the 1960's to improve patient access to care. Physician assistant's work with physician supervision to ensure patient safety. All physician assistants undergo the same training regardless of whether they will be supervised by an MD or an osteopathic physician.

I personally started my career under the supervision of an MD and had prescriptive authority. Recently, I changed positions and I am now supervised under an osteopathic physician. No longer having prescriptive authority, I have seen the benefits it provides. With prescriptive authority a physician assistant is much more valuable and efficient, freeing up time for the physician to focus on more complicated patients. In our office my supervising physician is only available to see patients three days out of the week. He is very busy between the office practice, two local nursing homes, an acute care long term rehabilitation hospital, in addition to caring for any of our inpatients at the local hospital. I was hired to increase the patient access at our office and help him with hospital rounds. Without prescriptive authority, I find my capabilities very limited and I continue to take up more of his time to get prescriptions for patients. Whether it is simple refills on routine medications or medicines for acute sick visits, it continues to be time consuming for both the patients and the physician. Our practice could expand immensely and become much more efficient if I was capable of prescribing under his supervision.

As you know, physician assistants have been safely prescribing under the supervision of allopathic physicians for years. Osteopathic physicians should have the same ability to delegate prescriptive authority to their physician assistant as their allopathic colleagues. This will significantly improve patient access to care by increasing availability of appointments and reducing waiting times. In addition, the physician will have more time to focus on more complicated cases. If Osteopathic physicians are able to supervise physician assistants with delegated prescriptive authority, they will be more valuable to patients, hospitals, and practices.

Each physician should decide whether his/her physician assistant will prescribe and what drugs the physician assistant will be permitted to prescribe. The regulations should be worded exactly the same as the allopathic regulations to avoid any confusion in clinical practice. With prescriptive authority physician assistant's will be more valuable to osteopathic physicians, meaning more practices may hire a physician assistant. This will improve patient access even further. The state of Pennsylvania has had difficulty recruiting and retaining physicians for some time now. By allowing physician assistants to practice to the full extent of their training, healthcare in Pennsylvania will be further ahead. Thank you for your time and consideration.

Sincerely,

Carrie Knipe, PA-C

cc: Basil L. Merenda, Governor Edward G. Rendell

**be you. be healthy.**