

2644

RECEIVED

October 29, 2007

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

2007 NOV 14 AM 9:15

INDEPENDENT REGULATORY  
REVIEW COMMISSION

OCT 31 2007

Dear Dr. Fasano,

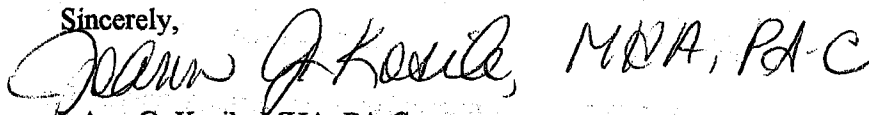
I am writing this letter in support of the proposed regulations to allow osteopathic physicians to delegate prescription writing to PAs they supervise, in the same manner that allopathic physicians have done. As you know, the proposed regulations were published in the Pennsylvania Bulletin on October 20, 2007. It is most logical that the regulations be worded exactly the same for both allopathic and osteopathic physicians.

I presently have 2 different supervising physicians, one an osteopathic physician, and the other an allopathic physician. The ability to write prescriptions allows an improvement in my ability to care for patients without the necessity for my supervising physician to cosign each prescription. Having the same prescriptive privileges regardless of who one works for will ensure continuity of care for all patients, especially in practices that employ DOs, MDs, and PAs. PAs working for MD's in the state of Pennsylvania have had prescriptive privileges for several years and all has been going well. In many other states across the country, PA's have had prescriptive privileges for many years without complications. Since the training for PA's is the same regardless of who employs them, and PAs have been practicing well with prescriptive privileges for MDs, it is apparent that PA's are well equipped to render care that involves authoring prescriptions. A foundation of PA practice is in knowing and understanding one's limitations, which extends to writing prescriptions. If I am unsure of a situation, I discuss it with my supervising physician before prescribing a medication.

As you are well aware, physician assistants have always been and continue to be in an interdependent relationship with their supervising physicians. Having prescriptive privileges does not change this relationship in the least. As always, the fact that PAs work with physician supervision helps to ensure patient safety. As a team, physicians and PAs develop a synergistic plan for treatment of patients. Enabling DO's to delegate prescriptive privileges helps to expand the services available for patients and makes PAs even more valuable to their DO supervising physicians. It allows for an increase in the availability of appointments for patients and frees the physician's time to focus on more complicated cases.

Thank you for your consideration of this important improvement to the delivery of quality healthcare in the Commonwealth of Pennsylvania. We are confident that the DO profession and their patients will reap many benefits from allowing the delegation of prescriptive privileges.

Sincerely,

 MHA, PA-C

JoAnn G. Kosik, MHA, PA-C

CC:

Basil L. Merenda

Governor Edward G. Rendell