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INDEPENDENT REGULATORY
REVIEW COMMISSION

NOV 2

October 29, 2007

Charles Fasano, DO, Chairman
Pennsylvania State Board of Osteopathic Medicine
P.O. Box 2649
Harrisburg, Pennsylvania 17105-2649

Dear Dr. Fasano:

I am Chairman of the Physician Assistant (PA) Program at Philadelphia College of Osteopathic Medicine in Philadelphia, Pennsylvania. I am writing in support of the proposed changes to Pennsylvania Code §§ 25.177 and 25.178 (relating to prescribing and dispensing drugs, pharmaceutical aids and devices; and medical records). I personally have experience working as a PA under the medical supervision of Pennsylvania osteopathic physicians. Many graduates of our PA Education program are supervised by osteopathic physicians. Adopting these regulations in exactly the form published in the Pennsylvania Bulletin on October 20, 2007 will greatly improve delivery of health care in the Commonwealth.

Access to care will be improved. Granting DOs the ability to delegate prescribing to the PAs they supervise will increase efficiency and effectiveness of care delivered both by DOs and by PAs. By delegating prescribing to PAs, DOs will be able to reduce time patients spend waiting for prescription signatures. The time savings accumulated throughout a typical day can provide additional appointment slots, improving access to care. It also can provide more time to the osteopathic physician to focus on more complicated patients. Shorter wait times will likely translate to better patient satisfaction. As a faculty member of a program at a school of osteopathic medicine I am aware that some current DO students may find it more attractive to remain in Pennsylvania after graduating if they can delegate prescribing to PAs they choose to supervise.

Confusion will be reduced. Adopting the regulations as proposed will bring them very close to the language already used by allopathic physicians. Similar PA prescribing rules will reduce potential for confusion by making it easier for practices using both DOs and MDs to process patients. All patients can be managed in the same way regardless of which type of physician is involved in supervising the PAs who see those patients.

Adopting these rules will advance a stated objective of Governor Rendell's Prescription for Pennsylvania. It will better allow PAs to work to the full extent of their training. As the director of a PA education program I can attest that all PA education programs provide extensive training in pharmacology needed to safely write prescriptions.

PAs have been safely writing prescriptions under MD supervision in Pennsylvania for over 15 years. Adopting the proposed regulations will allow PAs to continue to safely prescribe under supervision of DOs. As a licensed and practicing physician assistant in Pennsylvania, I urge the Board to adopt these proposed regulations.

Sincerely,

John M. Cavenagh, PA-C, PhD
Chairman & Associate Professor

Copies: Basil Merenda, Commissioner BPOA
Hon. Edward Rendell