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INDEPENDENT REGULATORY  
REVIEW COMMISSION

November 5, 2007

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

Dear Dr. Fasano:

I am an osteopathic physician and faculty member in the Department of Geriatrics at Philadelphia College of Osteopathic Medicine (PCOM) 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 have personal experience in teaching physician assistant students and in supervising physician assistants. It is my belief that adopting these regulations as published in the Pennsylvania Bulletin will improve health care delivery in the Commonwealth.

These regulations will help improve access to care for senior citizens. The geriatric patient population is one of fastest growing, and most needy, groups in our Commonwealth. As a practicing geriatrician, my office operating efficiency would improve by my being able to delegate, in advance, which prescriptions I wish to have PAs write for our patients. This would result in an accumulation of time saved throughout each day. The time saved could provide me with greater opportunities to provide direct care for the more complicated patients in my practice.

Because these rules are similar to those already being used by medical board, chances for confusion at pharmacies will be reduced. The rules as proposed let me decide which prescriptions my PA should write, as well as those which my PA should not write. These are just some of the ways these proposed regulations will help to improve patient safety.

In addition to teaching physician assistant students, I teach future osteopathic physicians. By giving osteopathic physicians the same privileges as allopathic physicians in Pennsylvania, I believe it will make it more attractive for PCOM osteopathic medical students to choose to practice in Pennsylvania after they become physicians. Adopting these rules will support one of Governor Rendell's objectives in Prescription for Pennsylvania. It will better allow PAs to work to the full extent of their training.

PAs have been safely writing prescriptions under MD supervision in Pennsylvania for many years. Adopting the proposed regulations will increase the ability of PAs to continue to safely prescribe under DO supervision. As a licensed and practicing osteopathic physician in Pennsylvania, I urge the Board to adopt these proposed regulations.

Sincerely,

Nicol Joseph, D.O.  
Instructor, Department of Geriatric Medicine

Copies: Basil Merenda, Commissioner BPOA  
Hon. Edward Rendell