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INDEPENDENT REGULATORY  
REVIEW COMMISSION

#2644

November 8, 2007

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

Dear Dr. Fasano:

I am Medical Director of the physician assistant education 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 believe that adopting these regulations as published in the Pennsylvania Bulletin on October 20, 2007 will improve health care delivery in the Commonwealth.

These regulations will help improve access to care. Osteopathic physicians will be able improve efficiency in operation of their practices be being able to delegate, in advance, which prescriptions they wish to have PAs write for their patients. This would result in an accumulation of time saved throughout each day. The time saved could provide them with greater opportunities to focus on the more complicated patients in their practices.

Because these rules are similar to those already being used by medical board, chances for confusion at pharmacies will be reduced. This will improve patient safety.

I teach physician assistant students. By allowing PAs to accept delegation of prescribing from osteopathic physicians, in the same way as with allopathic physicians in Pennsylvania, I believe it will make it more attractive for PCOM physician assistant students to remain in Pennsylvania after finishing training. 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.

In particular I support two sections of the proposed regulations. First I support that "A physician assistant may write a prescription for a Schedule II controlled substance for up to a 30-day supply if the patient was examined at the time of renewal and the patient's ongoing therapy was reviewed and approved by the supervising physician prior to the writing of the renewal." Second, I support "A physician assistant may request, receive and sign for professional samples and may distribute professional samples to patients."

PAs have been safely writing prescriptions under MD supervision in Pennsylvania for more than 10 years. Adopting the proposed regulations will expand the ability of PAs to continue to safely prescribe under supervision of DOs. As a licensed and practicing osteopathic physician in Pennsylvania, I urge the Board to adopt these proposed regulations.

Sincerely,

Gregory McDonald, D.O.  
Medical Director and Associate Professor  
Department of Physician Assistant Studies

Copies: Basil Merenda, Commissioner BPOA  
Hon. Edward Rendell