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November 11, 2007

Arthur Coccodrilli, Chairman  
IRRC  
14th Floor  
333 Market St  
Harrisburg, PA 17101

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Mr. Coccodrilli:

As chairman of the Governmental Affairs Committee and a practicing PA for 24 years, I am writing to you to express full support for the proposed prescribing regulations. Since 1993, PAs have been safely prescribing under allopathic supervision and last year as you know, the Pennsylvania Medical Society supported major revisions to those regulations.

The Osteopathic Board and the Pennsylvania Society of Physician Assistants have worked over the past year on language that would allow osteopathic physicians the authority to delegate prescriptive privileges to physician assistants. The Board reviewed the allopathic regulations and carved out the prescriptive portion. The PSPA has stressed through the whole process that the osteopathic prescriptive regulations be worded exactly the same as the allopathic regulations.

The Pennsylvania Osteopathic Medical Association has voiced concern regarding two areas of the proposed regulations. The first, allowing physician assistants to request and receive, sign for, and distribute pharmaceutical samples. They do not believe we should be able sign, accept or distribute samples. The reason for this stance is unclear, but it does not make sense that if you are permitted to prescribe, that you not be allowed to accept or dispense samples.

Secondly, they don't believe we should be able to write for a 30 day supply of a schedule II narcotic. Physician assistants work in areas of medicine that at times require the use of long term narcotics for pain control. Some of these areas include medical oncology, surgical subspecialties and pain centers. The prescriptions are reviewed and approved by the supervising physician for both initial and ongoing therapy. As part of the delegatory authority agreement the physician is responsible for proper supervision and adherence to the written and prescribing agreements.

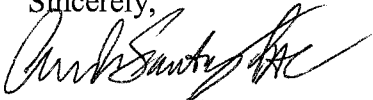
As I stated before, it is our belief that the osteopathic regulations be worded exactly the same as the allopathic regulations. By doing this, it will eliminate any confusion that two different sets of regulations would create amongst patients, pharmacists, and office staff.

Also, adopting these rules will support one of Governor Rendell's objectives in "Prescription for Pennsylvania." The physician/PA team will deliver medical care more effectively and efficiently and provide broader access to care.

In closing, I wish to express that osteopathic physicians should be afforded the same prescriptive authority delegation as allopathic physicians. They are both trained in the medical model, duly licensed as physicians in this Commonwealth, and shouldn't be regulated differently when it comes to delegatory authority.

Thank you for addressing one of the most important and needed aspects toward caring for the patients of our Commonwealth.

Sincerely,



Mark DeSantis, PA-C

Cc: Basil Merenda  
Commissioner, Bureau of Professional & Occupational Affairs  
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Harrisburg, PA 17105

Governor Edward G. Rendell  
225 Main Capitol Building  
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