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2729 DEC -9 AM 10:00

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INDEPENDENT REGULATORY REVIEW COMMISSION
HARRISBURG, PA

GENERAL PRACTICE

PHONE: AREA 610-558-2558

HARRISBURG, PA

December 4, 2008

Independent Regulatory Review Commission
Arthur Coccodrilli, Chairman
333 Market Street
Harrisburg, PA 17101

Dear Sir:

There are several areas of the proposed revision of regulations concerning CRNP scope of practice that I find worrisome, which would impact on patient safety and quality of care.

A verbal collaborative agreement is not verifiable and can be subject to misinterpretation at the least or confusion at the other extreme.

Broadly permitting complex diagnostic and therapeutic measures without specifying verifiable prescribed training and proof of competency is a clear and present danger. Allowing expanded prescribing of controlled substances is not in the public interest. The potential for further diversion is something that our society does not need.

Overriding or circumventing the DRC will further weaken the existing already weak controls and embolden those who seek loopholes for illicit access.

The proposed changes I fear are the segue to a multitiered system for medical care where the urban/suburban more affluent population will have better access to quality care while the more rural and poorer people will be left to lower level practitioners. This will set the stage for a fieldsher system of medical care such as existed in czarist Russia or as exists today in China where minions are treated by barefoot doctors while getting sicker and dying.

Is this really what the legislature of the Commonwealth of Pennsylvania really wants for our citizens?

Yours truly,



ALBERT S. KROSER, D.O., FAAFP