



Heritage Medical Group®

Listening, caring, leading.

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December 5, 2008

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

Dear Mr. Coccodrilli:

I am writing in my capacity as the Medical Director for a 63 physician and 19 non-physician provider multispecialty group in the Harrisburg area, and as a family physician with over 20 years experience working with CRNPs in my office. I want to express my opposition to the proposed regulations introduced by the Pennsylvania Board of Nursing that would dramatically change the scope of practice of certified registered nurse practitioners (CRNPs) in Pennsylvania, if enacted into law.

Please understand that I support the use of these trained professionals, as we have a significant need for them in order to address the issues of access to care in the Commonwealth. However, this activity must be properly supervised and regulated. These professionals are not physicians. They do not have the intensive training that physicians have, nor do they have the basic training in areas such as pathology and disease diagnosis as physicians do. The proposed regulations would endanger the most basic of obligations that we have for our patients; that is the obligation of safety.

There are a number of areas in the proposed regulations that put patient safety at risk. These include proposals that:

- A. Remove the need for detailed and written collaborative agreements,
- B. Liberalize prescriptive privileges,
- C. Allow independent diagnostic services to be provided without evidence of training or competency in these areas,
- D. Eliminate the need for physician notification and review,
- E. Eliminate the need for patients to be informed at the time of appointment that they are seeing a CRNP and not a physician, and
- F. Remove the current physician-CRNP ratio for collaboration.

Based on these issues, I ask that you rule to prevent the proposed changes from becoming law in Pennsylvania. Thank you for your consideration of my input.

Sincerely,

Joseph A. Cincotta, MD

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