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August 24, 2010

Chairman Arthur Coccodrilli
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

RE: Department of Health Final-Omitted Regulation (#10-191/IRRC # 2860)

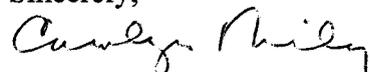
Dear Chairman Coccodrilli:

As a Certified Registered Nurse Practitioner (CRNP) in the state of Pennsylvania who provides care to the residents of HCR-Manorcare at Kingston Court in York, Pennsylvania, I would like to express my strong support of the final-omitted regulation entitled "Physician Assistants and Certified Registered Nurse Practitioners" as issued by the Department of Health. I urge the Independent Regulatory Review Commission (IRRC) to approve this regulation when it is considered at the September 16th meeting.

As noted by the department, the scope of practice of non-physician health care practitioners, such as Certified Nurse Practitioners, (CRNP's) has been expanded over time to increase the quality care and contain or reduce health care costs. CRNP's that practice in nursing homes provide quality health care to the residents under their care. They are burdened by the onerous provision that this final-omitted regulation will amend. Removing the inflexible seven day physician counter signature requirement of CRNP documentation in the nursing home setting and allowing the physician and nurse practitioner the flexibility to collaboratively determine the level of oversight needed is in the best interest of our residents. Removing barriers like these will free CRNP's to concentrate on providing the highest quality care.

I appreciate the Department's efforts in reaching out to the nursing home industry to develop this regulatory package. The CRNP's employed at Heartland Care Partners request that the IRRC approve this final-omit regulation. I thank you in advance for your action in this very important matter.

Sincerely,



Carolyn Nickey
Certified Registered Nurse Practitioner
Heartland Care Partners, a division of HCR ManorCare