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P.O. Box 128  
Greenburg, PA 15601

August 24, 2010

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

Agency: Department of Health  
Agency #: 10-191  
IRRC#: 2860  
Title: Physician Assistants and Certified Registered Nurse Practitioners  
Description: Removes the requirement that a certified registered nurse practitioner's documentation on a resident's record must be countersigned by the collaborating physician within 7 days.

Dear Mr. Coccodrilli:

On behalf of the Pennsylvania Society of Physician Assistants, I am writing to express support for this regulation and request that Physician Assistants be added to the language that removes the requirement of counter-signature within seven days in nursing facilities.

While preserving supervision and oversight is critical, requiring supervising physicians to co-sign every PA-written order or chart removes the doctors' discretion to exercise supervision in the way that works best for their practices and the facility. It also can place an unnecessary burden on the doctor, detracting from the efficiency of care the physician-PA team delivers. Rigid co-signature requirements in state law can diminish the opportunity for quality physician oversight. If, for example, a physician is required to counter-sign all routine orders, the doctor has less time available for in-depth discussion of specific cases with the PA.

Understandably, some may view this regulatory change as a risk to patient safety. The Society sees it as the removal of an unnecessary process. Physician Assistants have contact with their supervising physician on a daily basis. They are trained to recognize their limits and seek consultation on all questionable matters with the supervising physician. That is the foundation of the Physician/PA team.

The Society appreciates the efforts of the Department of Health in developing this regulation. We would like the Internal Regulatory Review Commission to add physician assistants to the body of the language.

Thank you for your attention to this matter.

Sincerely,

Mark S. DeSantis, PA-C  
Linda Sekhon, MMS, PA-C  
Governmental Affairs Division

Cooper, Kathy

2860

**From:** Mark DeSantis [msnkdesantis@aol.com]  
**Sent:** Saturday, August 28, 2010 6:44 PM  
**To:** IRRC  
**Subject:** Regulation 2860 Physician Assistant and Nurse Practitioner Counter-signature Removal in Nursing Facilities  
**Attachments:** IRRC Letter Regulation 2860.doc

Attached please find our comment letter regarding this regulation.

Thank you.

Mark DeSantis, PA-C  
Linda Sekhon, MMS, PA-C  
Governmental Affairs Division  
Pennsylvania Society of Physician Assistants

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