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Arthur Coccodrilli, Chair
Pennsylvania Independent Regulatory Review Commission
333 Market St, 14th Floor
Harrisburg, PA 17101

**Re: IRRC No. 2860 Physician Assistants and Certified Registered
Nurse Practitioners**

Dear Mr. Coccodrilli,

As President of the Pennsylvania Medical Society, I am writing to support the removal of the countersignature requirement with some recommendations for your consideration in the final-omitted regulation for certified registered nurse practitioners.

The Pennsylvania Medical Society believes that the current regulation in 28 Pa. Code § 211.7(c) does not appropriately correspond with Section 211.7(a) and (b) as provided in the recently expanded scope of practice actions taken in the Professional Nursing Law (PNL), 63. P.S. §§ 211-225.5. Due to this conflict, the current regulation places an unnecessary restriction on how the CRNP, the collaborating physician, and the long-term care facility determine the details of the relationship.

It was also found that the countersignature requirement has presented a significant barrier to resident care, which ultimately decreased facility, physician, and CRNP efficiency, as well as failed to improve resident safety. This burden of receiving countersignature of the collaborating physician within seven days interferes with the daily medical care of residents within long-term care facilities and does not recognize the recent amendments relating to the collaborative relationship between the CRNP and the physician.

While these amendments in Section 211.7(c) alleviate much concern and burden for CRNPs, the Pennsylvania Medical Society would like to raise the concern that physician assistants within the regulation are not included in the amendment.

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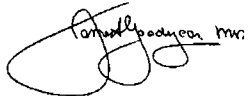
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It is important to recognize the physician assistants' scope of practice and we believe that the removal of the countersignature requirement from a collaborating physician should be extended to physician assistants as well.

I would also express concern over the use of the final-omitted process for consideration of these regulations. Even though the implementing regulations regarding CRNPs expanded scope of practice became effective December 2009, the underlying statute was passed in July 2007, allowing adequate time to promulgate the regulations through the normal process. The PA Medical Society, as well as the Pennsylvania Society of Physician Assistants would have liked to have been involved in the process through the drafting stage.

The Pennsylvania Medical Society respectfully asks that the Department consider withdrawal of this regulation for the inclusion of these suggested changes prior to final approval of the regulation. I appreciate the opportunity to provide comments to this regulation as it progresses. If there are any questions or concerns regarding these comments, please contact either Don McCoy at (717) 909-2649 or Amy Cazalas at (717) 909-2648.

Sincerely,



James A. Goodyear, MD
President

Cc: Melanie Waters, Director
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Susan Williamson, Director
Division of Nursing Care Facilities, Pennsylvania Department of Health
Everette James, Secretary
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