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2010 SEP -9 A 9 56

September 9, 2010

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

Dear Mr. Coccodrilli:

The Pennsylvania Osteopathic Medical Association has reviewed the final-omitted regulations regarding Certified Registered Nurse Practitioners (CRNP) and Physician Assistants (PA), and our physicians are greatly concerned. We believe that all notes should be countersigned by a physician; therefore, the countersignature requirement for CRNPs should not be removed, as expressed in the final-omitted regulation:

- * The Department of Health (Department) amends existing 28 Pa. Code §211.7 (relating to physician assistants and certified registered nurse practitioners) to make revisions to subsection (c), which requires that a certified registered nurse practitioner's documentation on a resident's record, including progress notes, physical examination reports, treatments, medications and any other notation made by the certified registered nurse practitioner (CRNP), be countersigned by the collaborating physician within seven days. The Department amends §211.7(c) by removing references to CRNPs.

POMA also believes that PAs should continue to have direct communication with their supervising physician, and advise them of any changes with patients immediately.

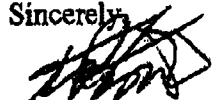
In order to provide the highest standard of health care to our patients throughout the Commonwealth, the POMA believes that CRNPs should always be under the direct supervision of a physician. We believe receiving a countersignature from a supervising physician within seven days is vital to protecting the interests and well-being of nursing home patients. Maintaining countersignature requirements for PAs in the nursing home environment is also vital to the patients' well-being.

The POMA recognizes the important roles CRNPs and PAs perform in the health care environment. However, we also recognize that residents of skilled nursing facilities are the frailest of the frail and require the highest level of care we can provide. The collaboration between physicians and physician extenders achieves that highest level of care. The team approach, including review of notes and countersignatures, is vitally important to the care of nursing home residents.

POMA was never notified of these changes or able to participate in any discussions. We feel this is important before any final regulations are published for implementation.

Thank you again for allowing the POMA to express our concerns regarding the final-omitted CRNP regulations. If you have any questions, please feel free to contact us at the number listed above.

Sincerely,



Kieren P. Knapp, D.O.
Co-chairman, Legislative Committee



Suzanne K. Kelley, D.O.
Co-chairman, Legislative Committee

cc: Melanie Waters, director, Bureau of Facility Licensure and Certification,
Pennsylvania Department of Health
Susan Williamson, director, Division of Nursing Care Facilities,
Pennsylvania Department of Health
Everette James, secretary,
Pennsylvania Department of Health
Honorable Patricia H. Vance, chair,
Senate Public Health and Welfare Committee
Honorable Vincent J. Hughes, minority chair,
Senate Public Health and Welfare Committee
Honorable Frank L. Oliver, chair,
House Health and Human Services Committee
Honorable Matthew E. Baker, minority chair,
House Health and Human Services Committee



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Date: September 9, 2010

From: Marce Monroe-Ward, Director of PR/Publications, for Mario Lanni, Exec. Dir.

Please Transmit the Following Pages to:

Name: Arthur Coccodrilli, Chair

Pennsylvania Independent Regulatory Review Commission

Total Number of Pages: 3 (including cover sheet)

FAX Number: (717) 783-2664

Note: Dear Mr. Coccodrilli:

Attached are the Pennsylvania Osteopathic Medical Association's comments
on the final-omitted regulations regarding certified registered nurse practitio-
ners and physician assistants. Thank you for the opportunity to express our
concerns.

If all pages are not received, please contact POMA at the telephone numbers below.

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