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Teresa Lockwood
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Chairman Arthur Coccodrilli
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
Email: irrc@irrc.state.pa.us

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IRRC
2010 SEP - 9 A 8:53

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

Dear Chairman Coccodrilli,

As a Certified Registered Nurse Practitioner practicing in Long Term Care I am writing to express my support for this regulation omitting the requirement for physician counter signing. Having worked previously in a specialty practice, where no counter signing was required, I find this regulation burdensome.

This regulation creates barriers to efficient care. Orders written by the nurse practitioner can be accepted and carried out. However they are then placed in an interim folder awaiting the physician's signature. These documents can wait several days for countersigning as most physicians do not come to long term facilities on a daily basis. Since the orders are not in the patient's chart, continuity of care can be disrupted as they are not visible to staff reviewing the chart. Once the orders are countersigned they are filed by the nursing staff. Not only does this cost staff time but also the potential for misfiling is evident. Physician time spent countersigning is also precious time that could be spent seeing the residents. As a Nurse Practitioner, I am aware of my scope of practice, and I collaborate with the physician when necessary. In most if not all other settings nurse practitioners practice without the requirement of countersignatures. Efficient use of all providers' time is vital, and I believe removing this regulation will streamline care of our patients.

Thank you for your consideration on this matter.

Sincerely,

Teresa Lockwood CRNP

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