



THE HOSPITAL & HEALTHSYSTEM ASSOCIATION OF PENNSYLVANIA

RECEIVED
IRRC

2010 SEP 13 P 3:37

#2860

September 13, 2010

Arthur Coccodrilli, Chairman
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:

The Hospital & Healthsystem Association of Pennsylvania (HAP), on behalf of its members, more than 225 acute and specialty hospitals and health systems, appreciates the opportunity to comment on the Department of Health's final-omitted regulations that seek to amend subsection (c) of 28 Pa. Code §211.7, relating to physician assistants and certified registered nurse practitioners (CRNP), by removing the requirement that a CRNP's documentation (specifically related to a long-term care nursing facility resident's clinical record, including progress notes, physical examination reports, treatments, medications, and any other notation made by the CRNP) be countersigned by the collaborating physician within seven days.

The regulations are of particular interest to HAP and its members because these regulations specifically address the utilization of CRNPs in nursing homes and a number of our hospitals and health systems have these long-term care facilities affiliated within their organizational structure.

As Pennsylvania has updated the practice acts and regulations for an array of qualified advanced practice health professionals in order to improve access to quality health care services, it is important that the state's facility regulations be updated to allow these health care professionals to practice within the full scope allowed under law in health care facilities. HAP believes these final-omitted regulations are consistent with the requirements in current state law and regulations as they pertain to CRNPs. HAP fully supports and appreciates the Department's efforts to remove the requirement for countersignature of CRNP documentation by the collaborating physician. We believe this amendment will allow for improvement in the delivery of quality health care services within the long-term care setting.

HAP also believes this amendment is consistent with the Department of Health's statement of policy for hospitals that does not require countersignature on CRNP orders for those specific privileges for which the CRNP has been afforded by the hospital. That statement of policy clarifies that a health care organization licensed by the Department may utilize nurse

4750 Lindle Road
P.O. Box 8600
Harrisburg, PA 17105-8600
717.564.9200 Phone
717.561.5334 Fax
haponline.org

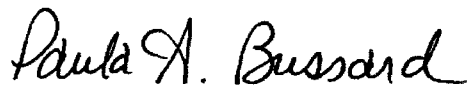


practitioners, nurse midwives, and physician assistants consistent with their respective practice acts and regulations provided the health care organization and its medical staff address these practitioners' qualifications, clinical duties and responsibilities, and the responsibilities of the physician members of the medical staff in relation to these practitioners in the organization's medical staff bylaws, rules, or regulations. Likewise, nursing homes should also be required to have effective evaluative and peer review/oversight processes in place to monitor the professional practices of CRNPs and other advanced practice professionals within their facility.

HAP respectfully requests that this regulatory package be approved as the revised regulations will ensure that long-term care facilities will be able to utilize these practitioners in a manner that promotes timely access to quality care. As Pennsylvania's health care organizations prepare for the changes in the delivery of health care services and the coordination of care as a result of the implementation of the federal health reform law, these revised regulations are a step in the right direction as they help to promote the full utilization of CRNPs within all health care settings.

HAP appreciates the opportunity to provide comments on this final-omitted rulemaking. If you have any questions about HAP's comments, please feel free to contact me at (717) 561-5344 or by email at pbussard@haponline.org; or Lynn Leighton, HAP's Vice President for Health Services, at (717) 561-5308 or by email at lgleighton@haponline.org.

Sincerely,

A handwritten signature in black ink that reads 'Paula A. Bussard'. The signature is written in a cursive, flowing style.

PAULA A. BUSSARD
Senior Vice President
Policy & Regulatory Services

#2860

From: Benita Gilreath [Bgilreath@haponline.org]
Sent: Monday, September 13, 2010 3:33 PM
To: IRRC
Cc: foliver@pahouse.net; mbaker@pahousegop.com; vancestaff@pasen.gov; hughes@pasenate.com
Subject: 9 13 10 HAP Comment Ltr. IRRC #2860
Attachments: 9 13 10 HAP Comment Ltr. IRRC # 2860.PDF

Attached please find The Hospital and Healthsystem Association of Pennsylvania's comment letter on the above stated issue.

Thank you. Have a good day.

Benita Gilreath
Secretary
Policy & Regulatory Services
The Hospital & Healthsystem Association of PA (HAP)
4750 Lindle Road
P.O. Box 8600
Harrisburg, PA 17105
(Phone) 717-561-5345
(Fax) 717-561-5334

RECEIVED
IRRC
2010 SEP 13 P 3:37

This email message and any files transmitted with it are intended for the use of the individual or entity to which they are addressed and may contain information that is privileged, proprietary, and confidential. If you are not the intended recipient, you may not use, copy, or disclose to anyone the message or information contained in the message. If you have received this communication in error, please notify the sender and delete this email message.
Visit HAP's website: <http://www.haponline.org>