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IRRC

September 13, 2010

2010 SEP 14 A 8:49

Chairman Arthur Coccodrilli  
Independent Regulatory Review Commission  
333 Market Street, Floor 14  
Harrisburg, PA 17103

Dear Chairman Coccodrilli:

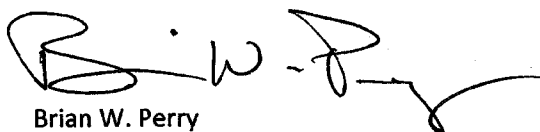
On behalf of Golden Living and our forty Golden LivingCenters in the Commonwealth of Pennsylvania, I am writing to express our support for the final-omitted regulation "Physician Assistants and Certified Registered Nurse Practitioners" as recommended by the Pennsylvania Department of Health (DoH) (IRRC #2860). We urge the approval of this regulation by the Independent Regulatory Review Commission (IRRC) during the meeting scheduled for September 16, 2010.

Our first priority at Golden Living is the quality care provided to residents across the Commonwealth. As recommended in the DoH final-omitted regulation, Certified Registered Nurse Practitioners (CRNPs) have had their scope of practice expanded over time to both increase access to quality care and to reduce healthcare costs. Nursing Homes are utilizing CRNPs at an increasing rate to enhance the care delivery for our residents, but they currently are held back by burdensome existing regulations that would be amended by the proposed regulatory change that has been issued by the Department of Health. This proposal would bring the CRNPs practice in the long-term care setting into consistency with the hospital setting.

This final-omitted regulation issued by the DoH removes inflexible oversight requirements of CRNPs in the nursing home setting and allow physicians to more efficiently determine the necessary oversight based on the specific needs of each resident in the facility. This would allow greater flexibility in delivering timely, quality care and would be in the best interest of the nursing home residents. This regulation would allow the Commonwealth's nursing home providers to more efficiently deliver the necessary services to our residents at the highest quality of care.

On behalf of our forty Golden LivingCenters in the Commonwealth, we thank the Department of Health for their willingness to work with Provider Associations, providers directly and other stakeholders in developing this favorable regulatory change. We support this effort fully and respectfully ask for the IRRC to approve this measure.

Sincerely,



Brian W. Perry  
Division Director of Government Relations

cc: Ms. Melanie Waters, Director, Bureau of Facility Licensure & Certification  
Senator Pat Vance, Majority Chair, Senate Public Health & Welfare Committee  
Senator Vince Hughes, Minority Chair, Senate Public Health & Welfare Committee  
Rep. Frank Oliver, Majority Chair, House HHS Committee  
Rep. Matt Baker, Minority Chair, House HHS Committee

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#2860

**From:** Perry, Brian [Brian.Perry@goldenliving.com]  
**Sent:** Monday, September 13, 2010 4:34 PM  
**To:** IRRC  
**Cc:** Kreider, Cindy [LC04833]; Antoun, Sue; Curry, Denise; Stordy, David 56 [LC04325]  
**Subject:** Submitted Comments: 10-191, Certified Registered Nurse Practitioners  
**Attachments:** Scan 102560000.pdf

Dear Sir or Madam:

Please find attached comments for the September 16 IRRC hearing, regarding "**Regulation #10-191, IRRC #2860: Physician Assistants and Certified Registered Nurse Practitioners.**" These comments are submitted on behalf of Golden Living, which operates 40 LivingCenters in the Commonwealth of Pennsylvania.

Thank you for the opportunity to voice our support of these proposed changes and please let me know if you have additional questions.

Best,  
Brian W. Perry

—  
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