

#2860

EMBARGOED MATERIAL

From: Tina Ignatavich [tignatavich@grandviewhh.com]
Sent: Wednesday, September 15, 2010 12:36 PM
To: IRRC
Subject: Department of Health Final-Omitted Regulation #10-191/IRRC #2860

September 15, 2010

Chairman Arthur Coccodrilli
Independent Regulatory Review Commission
333 Market St. 14th floor
Harrisburg, Pa. 17101

RECEIVED
IRRC
2010 SEP 15 P 1:06

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

Dear Chairman Coccodrilli,

On behalf of the Certified Registered Nurse Practitioner (CRNP) who provides quality care to the residents of Grandview Health Homes, I would like to express my strong support of the final-omitted regulation entitled "Physician Assistants and Certified Nurse Practitioner" as issued by the Department of Health. I urge the Independent Regulatory Review Commission to approve this regulation when it is considered at the September 16th meeting.

Under the amended version of this regulation, a physician must cosign documentation completed by the CRNP when appropriate. This change would remove constraints that were placed on the relationship between the CRNP and collaborating physician and allow for CRNP's to be utilized in a more efficient manner in accordance with their training and the Professional Nursing Law. The regulation will result in a reduction of existing, unnecessary and burdensome record keeping and paperwork.

I recognize the overall benefits that this regulation would have on our skilled nursing facility, physicians, the CRNP and the residents we serve. I support the Physician Assistant and Certified Registered Nurse Practitioners final-omit regulation number 10-191. I am confident that the results of this regulation will positively impact residents in nursing homes across the Commonwealth.

Sincerely,

Tina Ignatavich, RN/BSN
QA/QI Director

Grandview Health Homes, Inc.
49 Woodbine Lane
Danville, PA 17821
(570) 275-5240 ext. 140

tignatavich@grandviewhh.com
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2860

EMBARGOED MATERIAL

Gelnett, Wanda B.

From: Maria Urick [mmurick@geisinger.edu]
Sent: Tuesday, September 14, 2010 9:24 PM
To: IRRC
Subject: Physician Assistants and Certified Registered NursePractitioners

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IRRC

2010 SEP 15 A 8:03

Mr. Chairman

I am writing to support the proposed change eliminating the required 7 day physician cosignature requirement in longterm care (LTC) settings. As a nurse practitioner, my collaborative agreement directs my care/communication with my collaborating physician and allows for a more up-to-date/current picture of the patients I care for versus a note that is cosigned within 7 days of my patient encounter.

Our nurse practitioner regulations have kept pace with the changes in the health care and I ask that you consider changing the 7day cosignature requirement so that the long term care regulations can also keep pace with the changes in health care.

Sincerely,

Maria M. Urick CRNP

Maria M. Urick CRNP
General Internal Medicine
Grandview/Emmanuel
Zip: 14-01
Phone: 570-271-6164

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This letter is written in support of the initiative that would eliminate the requirement for NP's to have co-signatures for medical documentation in long-term care settings.

As a Board Certified Registered Nurse Practitioner for 14 years, I suggest that this requirement an unnecessary component on my level since regulatory statues demand that I must practice medicine with a high level of acuity. It is notable that the same requirement does not apply in all patient encounter circumstances, including practice by an NP in a private office setting, or in an acute-care hospital environment. At one time, the requirement may have been necessary in view of the fact that broad-scope practice by NP's was a fairly new concept, and did require oversight by a physician. However, in view of the successful integration and transition of advanced-practice nurses into a physician-extender role, the need for this requirement has diminished substantially. Furthermore, an NP is strictly bound by terms defined in a detailed Collaborative Agreement, under which an NP must practice within the scope of a supervising physician's specialty. The need for a physician's co-signature on medical progress notes and orders is a redundant effort that has no benefit in the current practice of advanced nursing. Finally, other states have eliminated the need for this requirement, including New Jersey. Our NP colleagues in that state have effectively practiced medicine for years sans the co-signature requirement, yet there is no evidence that would indicate that absence of the requirement has been detrimental in any way.

It is my hope that the requirement of having to include this unnecessary and time-consuming regulation in patient care by NP's is eliminated.

Sincerely,

Theresa Brady, CRNP
Mobile Wound Consultants
Media, Pa

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IRRC
2010 SEP 15 A 8:03

Gelnett, Wanda B.

From: Theresa [tmjbrady@aol.com]
Sent: Tuesday, September 14, 2010 9:38 PM
To: IRRC
Attachments: CRNP co signature.odt

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IRRC

2010 SEP 15 A 8:03

Attached is a letter supporting the removal of physician co signature in long term care.

Thank you,
Theresa Brady, CRNP

42860

AMERICAN ACADEMY OF NURSE PRACTITIONERS

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Office of Health Policy: PO Box 40130 · Washington, DC 20016 · 202-966-6414 · Fax: 202-966-2856 · E-mail: dcoffice@aanp.org
Journal (JAANP): PO Box 12965 · Austin, TX 78711 · 512-442-4262 · Fax: 512-442-6469 · E-mail: journal@aanp.org

September 7, 2010

EMBARGOED MATERIAL

2010 SEP 14 A 10:46
RECEIVED
IRRC

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

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

Dear Mr. Coccodrilli,

On behalf of the American Academy of Nurse Practitioners (AANP), our Pennsylvania nurse practitioners members and the patients served by the Pennsylvania's nurse practitioner community, I am writing to express support for the removal of the countersignature requirement for nurse practitioners in regulation #10-191 / IRRC # 2860) entitled "Physician Assistant and Certified Registered Nurse Practitioners".

Nurse practitioners are primary care providers who have a demonstrated track record for providing high quality, safe and cost effective care to elderly patients and frail patients in all settings, including for individuals that reside in skilled nursing and long-term care facilities. In several states, nurse practitioners provide care without any regulated physician involvement. Discussions with our Pennsylvania nurse practitioner members have made it clear that the 7-day countersignature requirement fails to add to the safety or quality of patient care. Instead, it creates an environment of delayed care and work redundancies that can drive up cost and decrease the efficiency of both nurse practitioner and physician providers in meeting care needs.

The AANP supports the Department of Health's efforts in addressing this needed update, and share the view that the existing requirement is inconsistent with recent updates to the Professional Nursing Law, and places unnecessary restrictions on the provision of care. We believe that the proposed update in #10-191 / IRRC # 2860 will address this issue, and is consistent with the Pennsylvania legislature's intent to utilize the healthcare workforce more effectively.

The American Academy of Nurse Practitioners, along with our Pennsylvania membership, respectfully asks that the Department of Health to move forward with approving this update at the September meeting. We appreciate the opportunity to provide comment to this regulatory process and its implication to care delivery. If there are any questions regarding the AANPs comments, please contact our health policy office at (202) 966-6414.

Sincerely,

Tay Kopanos, DNP, NP
Director of Health Policy, State Government Affairs

EMBARGOED MATERIAL

#2860

From: Taynin Kopanos [tkopanos@aanp.org]
Sent: Tuesday, September 14, 2010 10:32 AM
To: IRRC
Subject: IRRC No. 2860
Attachments: 9 2010 Countersign support letter.docx.doc

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IRRC

2010 SEP 14 A 10:46

Dear Mr. Coccodrilli,

The American Academy of Nurse Practitioners appreciates the opportunity to submit comments in advance of the September 16, 2010 meeting on IRCC No. 2860. A copy of our comments is attached. We appreciate your and the committee's time and attention on this matter.

Sincerely,
Tay Kopanos

Tay Kopanos, DNP, NP
Director of Health Policy, State Government Affairs
American Academy of Nurse Practitioners
303-994-5438 (cell)
512-442-6469 (fax)