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Mummah, Tawny (GC)

**From:** Mark DeSantis <msdpac83@gmail.com>  
**Sent:** Sunday, April 06, 2014 1:24 PM  
**To:** DA, licensuredivision  
**Subject:** Proposed Rulemaking Standards for Licensure Free Standing Facilities Drug and Alcohol Rehab Centers



2014 APR -9 PM 4: 09

RECEIVED  
IRRC

Ronald G. Young  
Director, Division of Program Licensure  
132 Kline Plaza  
Harrisburg, PA 17104

Dear Mr. Young:

Thank you for the opportunity to comment on Proposed Rulemaking Department of Drug and Alcohol Programs, Standards for Licensure of Freestanding Treatment Facilities. The Pennsylvania Society of Physician Assistants is committed to patient safety and educating physician assistants in our Commonwealth on the appropriate administration, regulation and management of pain syndromes with controlled medications. We have reviewed the proposed regulations and are in agreement with the language stated in the document. We would like to make one recommendation for your consideration however.

In section 709.32. Medication control:

(b) [D> Verbal medication orders may be accepted but shall be put in writing and signed within 24 hours thereafter by the prescribing physician.<D] [A> Verbal orders for medication can be given only by a physician, PHYSICIAN ASSISTANT, or other medical professional authorized by state and federal law to prescribe medication and such orders may be received only by another physician, pharmacist, or nurse, or medical professional authorized by state and federal law to receive such orders. When a verbal or telephone order is given, it has to be authenticated in writing by a physician or other medical professional authorized by state and federal law to prescribe medication. no later than 24 hours from the time the order was originally given. In detoxification levels of care such written authentication shall occur no later than 24 hours from the time the order was given. Otherwise, such written authentication shall occur within 3 business days from the time the order was given.<A]

This paragraph does address who may and may not give or accept verbal orders. In the Society's experience, regulations that do not specifically list physician assistants are frequently misinterpreted and challenged for a

PAs' ability to perform a particular task or procedure. As a professional Society, we understand the intended meaning and regulation but often the community looks for specific mention of our profession. Therefore, we would like to be added as a specific profession along with physicians as listed in the above section. We are in agreement with the regulations otherwise.

Thank you once again for the opportunity to comment on this proposed regulation.

Sincerely,

*Mark S. DeSantis, PAC*

Mark S. DeSantis, PAC

Chairman, Governmental Affairs

Pennsylvania Society of Physician Assistants