



From: [Abbie Ferry](#)
To: [ST, RegulatoryCounsel](#)
Subject: [External] Letter of support
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I am writing in support of the Proposed Rulemaking 16-4955 in reference to Physician Assistants as written. The changes in these regulations will modernize the delivery of patient care by the Physician-PA teams in Pennsylvania.

In particular, I'd like to point out the importance of section 18.142 - "No longer need to list all delegated functions the PA can perform. The new requirement is to describe the PA's scope of practice."

The rapidity with which new practice techniques and technologies evolve is staggering. In tandem, we face ongoing staffing challenges which leave sudden gaps of care for our patients. The ability to bypass state approval for each individual delegated function would better facilitate our ability to rapidly learn and assume new tasks under the supervision of our physician colleagues. Our hospital systems diligently monitor these credentials - especially as they pertain to procedural tasks. Hospitals alone are easily able to grant temporary credentials so that new tasks can be quickly assigned to physician assistants and learned under close, personal supervision from a physician colleague until the newly trained provider is deemed competent enough by the physician/hospital system to perform these tasks independently.

An example: For placement of central lines, physician assistants are often required to complete >10 successful placements under personal (shoulder-to-shoulder) guidance with a physician or trained/credentialed supervisor. If a physician assistant were assuming this credential, they may be able to successfully and competently complete >10 lines in a matter of days. However, revising their state agreement to reflect this specific task could take weeks to months. Tasks like this should be accounted for under scope of practice credentials - i.e. "the physician assistant will perform any and all tasks required to render safe and appropriate care within an ICU setting."

I thank you for your time and consideration.

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