From: <u>amyljones81</u>
To: <u>ST, RegulatoryCounsel</u>

**Subject:** [External] Proposed Rulemaking for Regulations 16A-4955 (Physician Assistants)

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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.

For your reference, the following list is the significant proposed new revisions.

## TITLE 59 PART 1 Subpart 1 CHAPTER 18 PROPOSED NEW REVISIONS

Section 18.122 Definitions

Addition of definition of scope of practice for a PA:

The medical services within a physician assistant's skills, training, and experience that a physician assistant may perform as set forth in the written agreement.

Section 18.142 Written agreements

- 1. No longer need to name each substitute physician the PA would work with.
- 2. No longer need to list all delegated functions the PA can perform. The new requirement is to describe the PA's scope of practice.
- 3. No longer need to describe the frequency of the personal contact the physician will have with the PA. The new requirement is to describe the nature and degree of supervision.
- 4. Additional language added to outline the ability for a delegate to complete the written agreement.
- 5. Requires only one primary practice setting be listed.

Section 18.144 Responsibility of primary supervising physician

- 1. The physician is no longer required to see a hospitalized patient at least once.
- 2. Clarifies the list of additional substitute supervising physicians. It only needs to be kept at the practice level.

Section 18.151 Role of the physician assistant

- 1. Outlines that PAs may provide medical services when they are within the PA's scope of practice.
- 2. Clarifies the PA may determine the cause of death.

Section 18.152 Prohibitions

- 1. The PA is now permitted to independently bill.
- 2. Provides an option for the supervising physician to apply to primarily supervise more than 6 PAs.

Section 18.153 Executing and relaying medical regimens

The PA is no longer required to notify their supervising physician within 36 hours when a medical regimen is executed or relayed when the physician is off-site.

Section 18.154 Substitute supervising physician

Adds a provision for the substitute supervising physician to assume primary responsibility for 30 days if the primary is permanently unable to supervise while a new written agreement is being filed.

Section 18.155 Satellite locations

The registration of a satellite location is no longer required. This section has been completely removed.

Section 18.158 Prescribing and dispensing drugs, pharmaceutical aids, and devices

- 1. Clarified that electronic prescriptions are permitted.
- 2. Removes requirement for the PA to notify the supervising physician when a medication is prescribed or dispensed within 36 hours if the physician is off-site.

Section 18.161 Physician assistants employed by health care facilities Restriction removed that a PA could only be responsible to three supervising physicians in a medical care facility

Amy Jones, PA-C, dipACLM

My YouTube Channel - Romaine Healthy

