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*University of Pittsburgh Physicians
Department of Neurological Surgery*

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INDEPENDENT REGULATORY
REVIEW COMMISSION

UPMC Presbyterian
Suite B-400
200 Lothrop Street
Pittsburgh, PA 15213-2582
412-647-3685
Fax: 412-647-5559

November 14, 2005

Charles D. Hummer, MD, Chairman
Pennsylvania State Board of Medicine
P.O. Box 2649
Harrisburg, PA 17105-2649

Proposed Rulemaking: Physician Assistants

Dear Dr. Hummer:

The Department of Neurological Surgery has utilized PAs for 30 years. We employ 10 physician assistants and 2 nurse practitioners in our group of 19 physicians and 18 neurosurgical residents. I write in support of the proposed changes to Pennsylvania Code Title 49, Chapter 18, relating to physician assistants. The proposed changes are an important update and will allow a more efficient use of physician assistants.

The proposed regulations eliminate redundant, overly restrictive and obsolete rules. While the proposed rules streamline the regulation of PA practice, they retain and clarify prudent and rational elements related to supervision, medical orders, prescriptions and reporting requirements. Furthermore, addressing the need for flexible staffing and team deployment is both practical and necessary to meet coverage demands in many medical facilities. Finally, the proposed rules for prescribing and dispensing controlled medications (including schedule II narcotics) and the introduction of a negative formulary into the written agreement will remove a significant barrier to the effective utilization of PAs in our practice which entails surgery and chronic pain.

The regulatory revisions are progressive and consistent with provisions adopted in many other states. They provide for good public protection while optimizing the safe utilization of PAs. On behalf of the entire faculty of the Department of Neurological Surgery, I urge the Board to adopt these proposed changes. Thank you for your consideration.

Sincerely,

L. Dade Lunsford, MD
Lars Leksell Professor and Chairman

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