



The Hospital + Healthsystem
Association of Pennsylvania

Leading for Better Health

March 15, 2023

Dana M. Wucinski, Esquire
Board Counsel
Pennsylvania State Board of Medicine
Bureau of Professional and Occupational Affairs
P.O. Box 2649
Harrisburg, PA 17105-2649

RE: 16A-4955 Exposure Draft Annex—Physician Assistants—State Board of Medicine

Dear Ms. Wucinski:

The Hospital and Healthsystem Association of Pennsylvania (HAP), on behalf of its more than 235 member hospitals, appreciates the Board of Medicine's commitment to the timely promulgation of regulations implementing Act 79 of 2021. We appreciate the opportunity to provide comments about the proposed regulations.

HAP's member hospitals and health systems provide health services across the continuum of care and are collectively committed to improving the health of Pennsylvanians and ensuring access to high-quality, cost-effective care.

Our hospital members employ many physician assistants who serve an essential role in providing safe, timely, and effective care to patients throughout the commonwealth. The implementation of Act 79 empowers physician assistants to practice to the top of their licenses while giving hospitals and health systems the ability to operate more efficiently.

After reviewing the proposed regulations, HAP generally supports the regulations, but would like to offer the following recommendations for clarification:

- Under § 18.14 (1)(6) written agreements, the draft regulations indicate that the primary practice settings must be identified when submitting a written agreement. The current written agreement application only requires one primary practice setting to be filed. HAP recommends that the word "settings" be changed to "setting" in this provision of the regulation.
- Under § 18.143(a), criteria for registration as a supervising physician, the draft regulations indicate that the physicians willing to provide substitute supervision must be listed. The current written agreement application only requires the name of one substitute supervising physician. HAP recommends that the word "physicians" be changed to "physician" in this provision of the regulation.



Leading for Better Health

HAP Comment Letter 16A-4955

March 15, 2023

Page 2

- Under § 18.154(a), substitute supervising physician, the draft regulations indicate that if the primary supervision is unavailable, appropriate arrangements for the delegation of patient care to the substitute physician assistant should be included in the written agreement. The following statement “and the substitute physician is registered as a supervising physician with the Board” suggests that the only substitute supervising physician that patient care can be delegated to is the one substitute listed on the written agreement. Under § 18.144 (6), it states that the primary supervising physician must maintain a current list of all substitute supervising physicians at the practice or facility with which the physician assistant will work. HAP recommends that the statement “and the substitute supervising physician is registered as a supervising physician with the Board” be removed in this provision so that any one of the substitute supervising physicians included on the list that is maintained at the practice or facility may be utilized.

Thank you for the opportunity to provide comments about the proposed regulations. If you have any questions or need any additional information related to our recommendations, please contact [me](#).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey W. Bechtel', is written over a light blue horizontal line.

Jeffrey W. Bechtel

Senior Vice President, Health Economics and Policy