



Leading for Better Health

August 13, 2021

Stephen Latanishen
Director of the Office of Intergovernmental Affairs
Pennsylvania Department of State
302 North Office Building
Harrisburg, PA 17120

RE: Request for Issuance of Statement of Policy—CRNP Collaborative Agreements within Same System

Dear Director Latanishen:

The Hospital and Healthsystem Association of Pennsylvania (HAP), on behalf of its members—more than 240 acute and specialty hospitals and health systems—appreciates the Department of State’s efforts to provide flexibilities relating to practitioner licensing during the COVID-19 pandemic.

As health care providers and practitioners worked to prepare for and respond to COVID-19, declarations at both the federal and state level permitted administrative agencies to take steps—including the waiver of regulations—to respond to the emergency. At the state level, these flexibilities included actions related to telehealth, facility licensure, workforce, prior authorization, and professional licensing. These flexibilities are slated to end on October 1, 2021.

The General Assembly, Wolf Administration, and other organizations—including HAP—have realized that many of the flexibilities granted during the pandemic should remain in place. In particular, as a result of the waiver, certified registered nurse practitioners (CRNP) who have a collaborative agreement with a physician in a hospital or health system now are permitted to collaborate with other physician(s) within the same hospital or health system, without written and signed collaborative agreements. This practice has been seen as extremely beneficial by CRNPs, health systems, and patients, and has served to increase access to care during the pandemic. To our knowledge, there has been absolutely no adverse consequences from the adoption of this practice and the elimination of burdensome requirements to obtain duplicative collaborative agreements.

Based on recent guidance from the Bureau of Professional and Occupational Affairs (BPOA), we understand that this policy flexibility is scheduled to be phased out on September 30, 2021.

Upon careful review, HAP has determined that there is no mention in law/regulation specifically indicating that a CRNP has to have a collaborative agreement with each physician that they work with either in one hospital or a separate collaborative agreement with other physician(s) within the same hospital or health system. As a result of this ambiguity, HAP believes that a policy statement could be issued by BPOA to permit the continuation of this practice, thereby



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eliminating unnecessary paperwork and administrative burdens for hospitals utilizing their CRNPs throughout their health systems. HAP respectfully requests that BPOA take this step to promote access to care for patients.

We need to continue to support our health care workforce and empower them to provide the safe, high-quality care our citizens deserve. Maintaining this flexibility through the issuance of a policy statement will bolster their efforts and allow our health care practitioners to utilize the full extent of their education and training.

Thank you for your consideration of this request, and please feel free to reach out to us should you have any questions or need any additional information.

Respectfully,

Jeffrey W. Bechtel, JD

Senior Vice President, Health Economics and Policy

The Hospital and Healthsystem Association of Pennsylvania

c: Kalonji Johnson, Commissioner, Bureau of Professional and Occupational Affairs