



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

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**Fwd: BOM- remote site clinic rules**

1 message

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**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:36 PM

**KENT M. NEBEL, J.D.**DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
400 SW EIGHTH STREET, SUITE C | DES MOINES, IOWA 50309  
OFFICE: 515-281-7088 | FAX: 515-281-8641[www.medicalboard.iowa.gov](http://www.medicalboard.iowa.gov) | [Facebook](#)

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----- Forwarded message -----

From: **Rachel Frederick** <rfrederick@storymedical.org>  
Date: Tue, Sep 25, 2018 at 10:15 AM  
Subject: BOM- remote site clinic rules  
To: <Kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

12/20/2018

State of Iowa Mail - Fwd: BOM- remote site clinic rules

Sincerely,

Rachel Frederick, PA-C



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

---

**Fwd: Comment On BOM Proposed Changes To Remote Site Rules**

1 message

---

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:35 PM

**KENT M. NEBEL, J.D.**DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
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From: **Karn Johansen** <johansek@mercyhealth.com>  
Date: Thu, Sep 27, 2018 at 12:31 PM  
Subject: Comment On BOM Proposed Changes To Remote Site Rules  
To: [Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov) <[Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov)>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely,

Karn Johansen PA-C

Mason City, Iowa

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Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

---

**Fwd: Iowa Board of Medicine's Remote Site Rules**

1 message

---

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:36 PM

**KENT M. NEBEL, J.D.**DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
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From: **Gross, Brady Michael** <Brady.M.Gross@dmu.edu>  
Date: Tue, Sep 25, 2018 at 7:58 AM  
Subject: Iowa Board of Medicine's Remote Site Rules  
To: [Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov) <Kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

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Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely,

*Brady Gross, PA-S*

Master of Science in Physician Assistant Studies Class of 2019

PA '19 Class President

Student Government Representative | College of Health Sciences

Student Admissions Ambassador

Des Moines University

[Brady.M.Gross@dmu.edu](mailto:Brady.M.Gross@dmu.edu)

(507) 216-2540



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

---

**Fwd: PA Requirements**

1 message

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**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:37 PM

**KENT M. NEBEL, J.D.**DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
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From: **pamela bartine** <pmbartine@hotmail.com>  
Date: Mon, Sep 24, 2018 at 9:12 PM  
Subject: PA Requirements  
To: [Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov) <Kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

**I'm concerned that if we continue with such strict guidelines, such positions in the rural settings are more likely to be filled by Advanced Practice Clinicians other than Physician Assistants, who require no supervision at all. In the long run, that may not be what's best for our patients, nor for the Physician Assistant profession. It may negatively impact physicians also.**

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely,

Pamela Sigmund PA-C



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

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**Fwd: PA rules change**

1 message

---

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:36 PM

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From: **Jankovich, Christopher J** <[Christopher.Jankovich@alegent.org](mailto:Christopher.Jankovich@alegent.org)>  
Date: Tue, Sep 25, 2018 at 11:14 AM  
Subject: PA rules change  
To: [Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov) <[Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov)>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely

Christopher Jankovich PA-C

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Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

---

**Fwd: PA Supervision Rules**

1 message

---

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:37 PM

**KENT M. NEBEL, J.D.**DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
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From: **CHAD or HEIDI QUIST** <chquist31@msn.com>  
Date: Mon, Sep 24, 2018 at 3:54 PM  
Subject: PA Supervision Rules  
To: [Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov) <[Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov)>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments. As a mental health practice owner, I am very interested in improving Iowa's mental health access. These changes would greatly assist us in our endeavor

Sincerely,

Chad Quist PA-C, MBA  
Director of Operations  
Heartland Christian Counseling  
Urbandale Iowa

Chad Quist PA-C, MBA  
Heidi Vermeer-Quist, Psy.D.  
Vermeer Quist Consulting  
[heidi@vqconsult.com](mailto:heidi@vqconsult.com)  
515-720-5436  
[chad@vqconsult.com](mailto:chad@vqconsult.com)  
515-720-3809

Be kind, for everyone you meet is fighting a great battle.  
- Ian MacClaran



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

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**Fwd: Proposed PA regulations**

1 message

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**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:37 PM

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From: **Wiegert, Jessica Ann** <Jessica.A.Wiegert@alumni.dmu.edu>  
Date: Mon, Sep 24, 2018 at 4:23 PM  
Subject: Proposed PA regulations  
To: [Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov) <Kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these

12/20/2018

State of Iowa Mail - Fwd: Proposed PA regulations

comments.

Sincerely,

Jessica Sheets PA-C



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

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**Fwd: Proposed remote site rules**

1 message

---

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:37 PM

**KENT M. NEBEL, J.D.**DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
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From: **Katy Meyer** <katymeyer87@gmail.com>  
Date: Mon, Sep 24, 2018 at 5:38 PM  
Subject: Proposed remote site rules  
To: <Kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these

12/20/2018

State of Iowa Mail - Fwd: Proposed remote site rules

comments.

Sincerely,

Katy Meyer, PA-C

Sent from my iPhone



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

---

**Fwd: remote site clinic rules**

1 message

---

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:35 PM

**KENT M. NEBEL, J.D.**DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
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From: **Natalie Weber** <NWeber@dbq.edu>  
Date: Fri, Sep 28, 2018 at 9:02 PM  
Subject: remote site clinic rules  
To: [kent.nebel@iowa.gov](mailto:kent.nebel@iowa.gov) <kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read as follows:

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

It would also allow PAs to be competitive in the market based on qualifications and not overlooked or not recruited because of a strict supervisory rule.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments. University of Dubuque's PA program is dedicated to its mission of training clinicians to serve in rural and underserved areas, however, this rule as currently written does not support one of the primary

roles of PAs in health care. As the current rule stands, it puts unnecessary limitations on qualified health professionals who are educated in patient-centered teams and provider collaboration. This can be effectively and efficiently done through various secure communication methods not requiring an on-site visit.

Please consider aligning this rule with federal rules.

Sincerely,

Natalie

**Natalie Weber, PA-C, MSPAS**

*Program Director*

University of Dubuque, Physician Assistant Program

2000 University Ave, [Dubuque, IA 52001](#)

**Office: (563)589-3665** F: (563)589-3650

Email: [nweber@dbq.edu](mailto:nweber@dbq.edu)





Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

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**Fwd: Remote Site Clinic Rules**

1 message

---

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:36 PM

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From: **Unger, Michael S.** <[Michael.Unger@unitypoint.org](mailto:Michael.Unger@unitypoint.org)>  
Date: Wed, Sep 26, 2018 at 12:09 PM  
Subject: Remote Site Clinic Rules  
To: [Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov) <[Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov)>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

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Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely,

Michael S. Unger, PA-C

UnityPoint Clinic – [Sunnybrook](#)

5885 Sunnybrook Drive

Sioux City, Iowa 51106

(712) 266-2700

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Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

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**Fwd: remote site rules**

1 message

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**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:36 PM

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----- Forwarded message -----

From: <[megstipe@aol.com](mailto:megstipe@aol.com)>  
Date: Wed, Sep 26, 2018 at 7:15 PM  
Subject: remote site rules  
To: <[Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov)>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely,

Meghan Bohlender PA-C



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

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**Fwd: Rural PA supervision**

1 message

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**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:35 PM

**KENT M. NEBEL, J.D.**DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
400 SW EIGHTH STREET, SUITE C | DES MOINES, IOWA 50309  
OFFICE: 515-281-7088 | FAX: 515-281-8641[www.medicalboard.iowa.gov](http://www.medicalboard.iowa.gov) | [Facebook](#)

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----- Forwarded message -----

From: **Danie Frazee** <fsdfrazee@aol.com>  
Date: Thu, Sep 27, 2018 at 5:52 AM  
Subject: Rural PA supervision  
To: <Kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

As a PA who spent 11 years as sole provider at rural Clinic, I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

I am also concerned that recent legislation has been prejudicial towards PAs making us less marketable in the state and adding administrative burden to physicians. If rules are to be changed for PAs it should also be for our nurse practitioner colleagues to be fair.

12/20/2018

State of Iowa Mail - Fwd: Rural PA supervision

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely,

Danie Frazee PA-C, MPAS

Sent from my iPhone



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

**Fwd: supporting PA supervision at remote sites**

1 message

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:36 PM

**KENT M. NEBEL, J.D.**

DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
400 SW EIGHTH STREET, SUITE C | DES MOINES, IOWA 50309  
OFFICE: 515-281-7088 | FAX: 515-281-8641

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----- Forwarded message -----

From: **Jayson Gesulga** <gesulga.jayson@gmail.com>  
Date: Tue, Sep 25, 2018 at 7:57 PM  
Subject: supporting PA supervision at remote sites  
To: <Kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely,

Jayson Gesulga, PA-C



Greco, Chrissy &lt;chrissy.greco@iowa.gov&gt;

**Fwd:**

1 message

**Nebel, Kent** <kent.nebel@iowa.gov>  
To: "Greco, Chrissy" <chrissy.greco@iowa.gov>

Thu, Dec 20, 2018 at 2:37 PM

**KENT M. NEBEL, J.D.**

DIRECTOR OF LEGAL AFFAIRS | IOWA BOARD OF MEDICINE  
400 SW EIGHTH STREET, SUITE C | DES MOINES, IOWA 50309  
OFFICE: 515-281-7088 | FAX: 515-281-8641

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----- Forwarded message -----

From: **Doobay, Marc F** <marc-doobay@uiowa.edu>  
Date: Mon, Sep 24, 2018 at 10:14 AM  
Subject:  
To: [Kent.nebel@iowa.gov](mailto:Kent.nebel@iowa.gov) <Kent.nebel@iowa.gov>

Dear Iowa Board of Medicine members,

I am writing to ask that the proposed PA remote site clinic rules be made consistent with the federal rules and those of the majority of states; including most of Iowa's neighboring states. That could be done by amending the rule to read;

At least one supervising physician and the PA practicing at the remote site shall document a meeting, via any form of secure communication at least once every six months to evaluate and discuss the medical facilities, resources, and medical services provided at the remote medical site.

This proposed change would make Iowa's PA rules consistent with the Federal Rural Health Clinic rules, decrease costs of providing care in rural areas, and reduce physician downtime spent traveling instead of seeing patients, and thereby improving availability of care in small towns.

Allowing the practice to determine the details of PA practice oversight has proven safe and effective in the majority of states and in four of Iowa's bordering states. It is time for Iowa to do the same.

Thank you for efforts to help increase care in our underserved areas and your attention to these comments.

Sincerely,

Marc Doobay

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Marc Doobay, MPAS PA-C

Department of Family Medicine

University of Iowa Hospitals and Clinics

[marc-doobay@uiowa.edu](mailto:marc-doobay@uiowa.edu)

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September 25, 2018

*Electronic Delivery*

Kyle Ulveling, MD, Chair  
Board of Medicine, State of Iowa  
400 SW 8<sup>th</sup> Street, Suite C  
Des Moines, IA 50309  
[Kent.Nebel@iowa.gov](mailto:Kent.Nebel@iowa.gov)

**In re: Public comments to ARC 3992C, relating to: physician supervision of PA-staffed remote medical sites.**

Dear Chair Ulveling and Members,

On behalf of the members of the American Academy of PAs (AAPA), thank you for this opportunity to comment on ARC 3992C that amends chapter 21 of title 653 relating to physician supervision of physician assistant (PA) – staffed remote medical sites.

Under the current rule, generally, a supervising physician must visit a remote medical site at least every two weeks. Under the proposed rule, a supervising physician must visit or communicate with a remote medical site at least every two weeks, and at least one supervising physician must visit and document a remote medical site once every six months.

AAPA appreciates the additional flexibility the proposed rule provides. However, the proposed rule still places a burden on physicians (and PAs) without any evidence that the rule provides benefits that outweigh the costs. Instead, the supervising physician and PA should decide the appropriate communication necessary based on the education, experience, skills and experience of each. AAPA urges the board to eliminate 21.4(6) entirely, consistent with nearby states and federal policy.

Promulgating unnecessary requirements may result in placing the board in the unfortunate position of disciplining physicians (and harming PAs) otherwise providing excellent patient care who failed to comply with the technical aspects of an arcane rule.

AAPA encourages the board to avoid unnecessary requirements that divert the time and resources of supervising physicians and PAs towards burdensome compliance measures instead of caring for Iowans.

Thank you again for this opportunity to comment on the above-captioned rule. If you have any questions, please feel free to contact me at 571-319-4314 or [apeer@aapa.org](mailto:apeer@aapa.org).

Sincerely,

Adam S. Peer, Director  
State Advocacy  
American Academy of PAs

cc: Jeremy L. Nelson, PA-C, President, Iowa PA Society [ajkopfmannelson@yahoo.com](mailto:ajkopfmannelson@yahoo.com)  
Stacey Reichling, Executive Director, Iowa PA Society [stacey@iapasociety.org](mailto:stacey@iapasociety.org)  
Susan Koehler, PA-C, Chair, Iowa Board of Physician Assistants