

LYNN B. HERMAN, MEMBER

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## House of Representatives

COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

June 21, 2000

Original: 2064

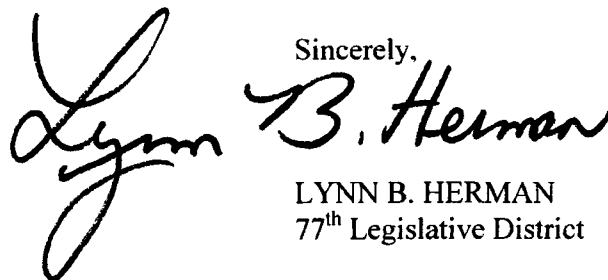
Mr. Robert Nyce, Executive Director  
Independent Regulatory Review Commission  
14<sup>th</sup> Floor, Harrisstown 2  
333 Market Street  
Harrisburg, PA 17101

Dear Mr. Nyce:

Enclosed please find a copy of correspondence I have received from Ms. Linda Shorey of State College, Centre County, recommending the disapproval of the amendment to the CRNP regulations which were voted upon by the Board of Nursing.

I believe Ms. Shorey's rationale for disapproving these proposed regulations is self-explanatory in her correspondence. I am writing to assure that Ms. Shorey's concerns in this regard are taken into consideration by you and the Independent Regulatory Review Commission. I am requesting that the IRRC disapprove the regulations as currently written and have them returned to the Board of Nursing for further negotiation and collaboration with the regulating community.

Should you have any questions regarding this matter, please feel free to contact me.

Sincerely,  
  
LYNN B. HERMAN  
77<sup>th</sup> Legislative District

LBH/bmr  
CC: Ms. Linda Shorey, CRNP

### COMMITTEES

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INDEPENDENT REGULATORY REVIEW COMMISSION

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2000 JUN 26 AM 9:41

784 Cornwall Road  
State College, PA 16803  
June 15, 2000

Representative Lynn Herman  
301 S Allen Street  
State College, PA 16801

INDEPENDENT REGULATORY  
REVIEW COMMISSION



Dear Representative Herman,

I request you to contact the Independent Regulatory Review Commission to ask them to disapprove the amendment to the CRNP regulations that were voted upon by the Board of Nursing. I understand a great effort went into the negotiation of this amendment, but I have serious concerns about how the current version will limit health care access in Pennsylvania. The following topics are the reasons for my apprehension.

1. 2 CRNP: 1 physician ratio. No other state in the US has such a limiting ratio. I have worked in several situations in Pennsylvania where this ratio would constrain current practice, therefore in-turn reducing access to care for clients.
2. 45-hour pharmacology course requirement. Most CRNPs have had this course, but it was integrated in a larger course of study. Certainly pharmacology should be a requirement for all prescribing CRNPs. Allowing summation of advanced pharmacology hours to a total of 45 hours serves the same purpose.
3. Drug categories. CRNPs should be able to prescribe and dispense "eye, ear, nose, and throat preparations; hormones and synthetic substitutes; oxytocics; unclassified therapeutic agents; medical devices; pharmaceutical aids". Basic practice often dictates the use of these fundamental items.
4. Maintain Board statutory Board authority vs. the collaborating physician identifying drug categories that a CRNP may prescribe and dispense. Current regulation revisions put the responsibility on the collaborating physician for CRNP prescription writing. The affected regulated community and the public have not had an opportunity to comment on this change.

Thank you for reviewing my concerns. Please ask the IRRC to disapprove the regulations as they are now written and return them to the Boards for further negotiation and collaboration with the regulated community. It is vital the Board of Nursing represent the interests of the profession in its role to protect the health, safety and welfare of Pennsylvania citizens.

Sincerely,

Linda Shorey, CRNP

Cc:  
Robert Nyce, Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Governor Tom Ridge  
225 Main Capitol  
Harrisburg, PA 17101

Representative Mario Civera, Chair  
Professional Licensure Committee  
House of Representatives  
P.O. Box 202020  
Harrisburg, PA 17101-2020

Senator Clarence Bell, Chair  
Consumer Protection & Professional Licensure Committee  
Senate Box 203009  
Harrisburg, PA 17101

Mr. Steve Anderson, Chair  
Pennsylvania Board of Nursing  
P.O. Box 2649  
Harrisburg, PA 17101