

**21ST SENATORIAL DISTRICT  
MARY JO WHITE**

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*Senate of Pennsylvania*  
June 23, 2000

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

Original: 2064

Dear Mr. Nyce:

I am writing to ask IRRC to disapprove final regulation #16A-499: State Board of Medicine and State Board of Nursing: Nurse Practitioner Prescribing.

As a legislator from a rural area, I am concerned about the ratio, contained in the regulations, of one physician to two prescribing CRNPs. I believe access to care is threatened by this low ratio. CRNP practices and nurse-run centers across the state provide essential health care for underserved populations. I also question the fact that a physician, not a CRNP, must apply for the waiver and the undefined process to obtain a waiver. In addition, this limitation was added after the close of the public comment period. Stakeholders and the public have not had an opportunity to comment on this substantive change.

Another section of the regulation that concerns me is the 45 hour advanced pharmacology course stipulation. Defining the advanced pharmacology hours to include 45 hours in total rather than 45 hours in one course would allow practicing CRNPs credit for previous coursework.

I would appreciate your careful and thoughtful consideration of my concerns regarding the ratio and pharmacology requirements.

Sincerely,

A handwritten signature in cursive script that reads "Mary Jo White".

MARY JO WHITE  
SENATOR, 21ST DISTRICT

MJW/lhr

cc: Morgan Plant  
Susan Shanaman

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2000 JUN 23 PM 12:12  
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