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*House of Representatives*  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

July 6, 2000

Original: 2064

Honorable John R. McGinley, Jr., Chairman  
Independent Regulatory Commission  
14th Floor, Harrisstown #2  
333 Market Street  
Harrisburg, Pennsylvania 17101

RE: Regulation 16A-499, State Boards of Medicine and Nursing

Dear Chairman McGinley:

I am writing to express my concerns with the final form regulations jointly submitted by the State Board of Medicine and the State Board of Nursing concerning the practice of prescribing and dispensing of drugs by Certified Registered Nurse Practitioners (CRNPs). Because of a critical flaw in the process by which these regulations were adopted, I would urge you to disapprove them.

In particular, it is a disservice to the public for the boards to have substantively amended the proposed regulations prior to final adoption without allowing all interested parties the opportunity to provide comment thereon.

Obviously, the public should have some assurance that anyone who is permitted to prescribe drugs is qualified to do so. Thus, CRNPs did not object to the proposed regulations requiring advanced pharmacology education. However, the boards, in finally adopting these regulations, now require a 45 hour discrete course in advanced pharmacology. This provision is effective immediately, without regard to the license renewal period for the CRNP. "Discrete courses" are generally unavailable to CRNPs, as well as to physicians. My personal review of the pharmacology courses given at the eight medical schools in the Commonwealth shows that all of these schools offer pharmacology as an integrated course. (See attached chart.) Thus, CRNPs are being asked to acquire a pharmacology education (e.g., by a discrete course rather than through an integrated curriculum) in a manner that is not required of physicians, who are asked by the regulations to assume total liability for the CRNPs prescribing actions.

The boards should clearly identify prescribers or courses that would meet this requirement. The regulation should identify the process for approval of providers or courses and the deadline for doing so. Otherwise, it is unlikely that any CRNP would qualify to prescribe within the foreseeable future.

It is the health of the public that should be of paramount concern. The likelihood that coverage to rural or inner city Pennsylvanians will be continued at their present levels is questionable at best with the passage of the regulations as currently written. We should all be concerned about that.

I urge the Commission to carefully consider all the implications of this rulemaking before making its decision.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Mary Ann Dailey".

Dr. Mary Ann Dailey, RN  
State Representative, 146<sup>th</sup> Legislative District

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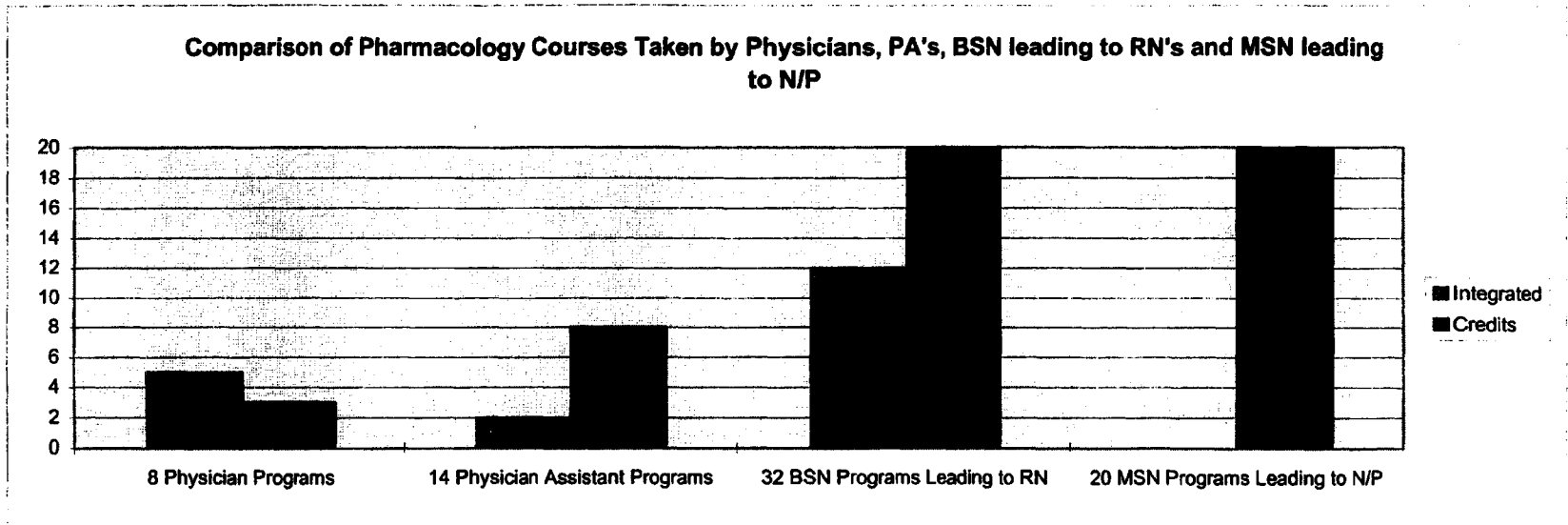
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**Comparison of Pharmacology Courses Taken by Physicians, PA's, BSN leading to RN's and MSN leading to N/P  
Integrated Credits**

8 Physician Programs	5	3
14 Physician Assistant Programs	2	8
32 BSN Programs Leading to RN	12	20
20 MSN Programs Leading to N/P	0	20



Integrated = Pharmacology imbedded in curriculum  
For Credit Course = free standing course in Pharmacology