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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

Original: 2064

COMMITTEES

APPROPRIATIONS
JUDICIARY
INSURANCE
POLICY

July 7, 2000

VIA FAX 717-783-2664

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

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

Dear Chairman McGinley:

I am writing to urge the Independent Regulatory Review Commission (IRRC) to disapprove the final form regulations governing the dispensing and prescribing of drugs by Certified Registered Nurse Practitioners (CRNPs).

The State Board of Medicine and the State Board of Nursing made substantive and substantial changes to the proposed regulations prior to final adoption without allowing all of the interested parties an opportunity to comment on the amendments.

Public health and safety is of paramount importance to me. The public must be confident that those allowed to prescribe drugs are qualified to do so. Requiring advanced pharmacology education is appropriate; however, the final form regulations call for a specific 45-hour course, effective immediately. It is my

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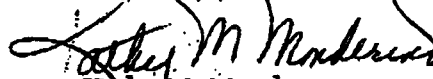
understanding that such courses generally are not available to CRNPs, or to doctors for that matter. Further, the implementation time frame does not take into consideration the license renewal period for CRNPs. The Boards should identify specific providers or courses that meet the education requirement; otherwise, the granting of prescriptive authority to CRNPs is meaningless because no one will qualify.

In addition, the proposed final form regulations limit to two the number of CRNPs that a physician can collaborate with (the 2:1 ratio), while the proposed rulemaking suggested no limit, and the few comments received which suggested any limit recommended a 4:1 ratio. The waiver provided for in the final form regulations is not sufficient to resolve many of the concerns that have been raised about the collaboration limit. Before the regulations are approved, there needs to be clear standards for the granting or denial of a waiver.

Because of these serious and important concerns about final form regulation 16A-499, I urge the IRRC to require that these concerns be addressed before approval is given.

Thank you for your attention to my concerns.

Very truly yours,


Kathy M. Manderino
State Representative
194th District

KMM/bdt