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House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

COMMITTEES

PROFESSIONAL LICENSURE,
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INSURANCE

July 10, 2000

Original: 2064

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

Dear Chairman McGinley:

This is written in regard to the final form regulation 16A-499 jointly submitted by the State Board of Medicine and the State Board of Nursing.

This is no objection to the requirement of a 45 hour course in advanced pharmacology. There is great concern about the provision of mandating this course to be taken at one time which would force many CRNP's to take leave to obtain this. Also, presently they are no approved specific providers of these courses.

More importantly, there have been substantive changes to the collaboration agreements between physicians and CRNP's. There was never any discussion about ratios while the public comment period was open. After this comment period closed, a ratio of 2:1 was instituted. Presently, only 2 states have ratios of any kind and that is 5:1 - all others contain no ratio at all. A poorly defined request for a waiver to be done only by a physician was added, with no time requirements noted.

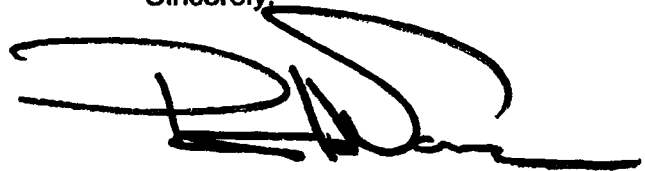
This ratio would severely disrupt the delivery of health care especially in clinics in urban and rural areas who could not afford to hire more physicians. In actual practice, physicians frequently collaborate with more that two CRNP's. No evidence was cited to support the need for a 2:1 limitations since this came to light after the public comment period and no one with actual experience had an opportunity to express their views.



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The idea of a waiver is idealistic and ill defined and offers no guarantees that the same standards would apply to each waiver request. It does appear that this ratio would really cause great damage to the delivery of health care in our Commonwealth.

Sincerely,

A handwritten signature in black ink, appearing to be 'Pat Vance', written in a cursive style.

Patricia H. Vance
Representative 87th District

PHV/ikr