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REPLY TO:  
 HARRISBURG  
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**Senate of Pennsylvania**

Original: 2064

July 10, 2000

**COMMITTEES**

EDUCATION, DEMOCRATIC CHAIR  
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PUBLIC HEALTH & WELFARE  
STATE GOVERNMENT

PA HISTORICAL AND MUSEUM COMMISSION  
STATE BOARD OF EDUCATION  
EDUCATION COMMISSION OF THE STATES

**By Facsimile 717 783-2664**

Pennsylvania Independent Regulatory Review Commission  
333 Market Street  
14<sup>th</sup> Floor  
Harrisburg, PA 17101

Dear Commissioners:

I am writing to express my concerns about the State Board of Nursing regulation entitled Certified Registered Nurse Practitioners Prescriptive Authority (regulation number 16A-499, IRRC number 2064). The Commission is scheduled to vote on the regulation at its next public meeting on July 13, 2000. The Commission should give serious consideration to disapproving the regulation, on the following grounds:

- The regulation requires a ratio of certified registered nurse practitioners to physicians of two to one. This ratio, inserted into the regulation only after the public comment period, appears to be unjustified and to jeopardize access to quality care. Only very few states prescribe CRNP to physician ratios, and in those states, the ratio is far higher.
- The regulation requires 45 hours of pharmacology coursework in " a specific course." Again, this is a significant change from the regulation put before the public during the comment period. Advanced pharmacology education for CRNPs is undoubtedly essential. However, allowing CRNPs to obtain 45 hours of training in more than one course rather than in one specific course would allow CRNPs to receive credit for previous coursework. This would seem to fulfill the need for adequate training without imposing needless burdens of cost and substantial time away from work.

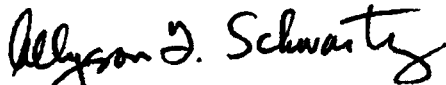
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July 10, 2000  
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- The regulation does not include all of the drug categories listed in the American Hospital Formulary. Given that CRNPs are now to be permitted to prescribe medications, there seems to be no cause for the omission of "ear, nose, and throat preparations; hormones and synthetic substitutes; oxytocics; unclassified therapeutic agents; medical devices; [and] pharmaceutical aids" from the list of authorized drugs. Indeed, I understand that the Board of Nursing approved this regulation only on the condition that the above-quoted language would be added.

Thank you for your attention to these important concerns.

Yours truly,



Allyson Y. Schwartz  
State Senate - 4<sup>th</sup> District

cc: Jennifer Steele, MSN RN CRNP  
Ann Linguiti Pron MSN RN CRNP  
Elizabeth A. Coyne MSN RN CRNP CEN  
The Hospital and Healthsystem Association of Pennsylvania  
Pennsylvania Coalition of Nurse Practitioners  
Pennsylvania State Nurses Association