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INDEPENDENT REGULATORY
REVIEW COMMISSION

Ann Steffanic
Board Administrator
Pennsylvania State Board of Nursing
PO Box 2649
Harrisburg, PA 17105-2649

Re: 16A-5124 CRNP General Revisions

Dear Ms. Steffanic,

I am a Nurse Practitioner that practices at a Federally Qualified Health Clinic in Lancaster PA. The revisions that are proposed would help my practice immensely. The FQHC has two sites to practice from.

At present if I am at a site without a physician, I am limited in how I can effectively manage my patients. If I would like to prescribe a scheduled II then they have to come back in 72 hours for more medication. Currently my patients with Attention Deficit need to be scheduled on particular days when I know I am working with a physician that will be with me that can write the prescription for the Scheduled II medication that is required to treat the disease. If the staff accidentally schedules a patient who requires scheduled II narcotics and a physician is not available to write the prescription, I explain that I am limited to give only 72 hours worth and that they will have to return in 3 days for another prescription. This is often a hardship for many of my patients. Also when prescribing Schedule III / IV narcotics I need to have the patient back in the office on a monthly basis, when an every three month basis would be justified. Again this is often a hardship for my patients as some do not drive and others have a very limited income and cannot always afford the gas to come in to the office.

I would greatly appreciate if the stipulations on Schedule II narcotics as well as Schedule III / IV narcotics would be changed to the proposed ruling. I prescribe the least amount of narcotics in the office.

Sincerely,



Dorcas Richl CRNP, FNP