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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: Proposed changes to CRNP Practice

Dear Administrator Steffanic,

I write this letter to you as a new Pennsylvanian resident and Nurse Practitioner.

I am a DNP, or Doctor of Nursing Practice, with the Department of Palliative Medicine/Oncology at Geisinger Medical Center in Danville, Pennsylvania.

I am asking for your support with the proposed changes to CRNP practice. The proposed changes would drastically affect my practice, and service the overall, mutual goal of enhanced and improved patient care:

1. **Allow 30-day prescriptions for Schedule II and 90-day prescriptions for Schedule III and IV controlled substances:** My current practice with Palliative Medicine necessitates the administration of high dose narcotic medications. The current limitations on NP Practice severely restrict my ability to provide comprehensive and compassionate care to patients at the very end of their lives, when my ability to help them could make the greatest and most humbling of impact for both patients and their loved ones. Prior to relocating to Pennsylvania, the majority of my decade long NP career was in NYS, where NP practice allowed us to prescribe long term controlled substances. In a world where co-pays and medical fees are climbing as healthcare corporations struggle to maintain financial stability, asking patients to fill additional prescriptions is exquisitely unfair. And in my practice region of north central Pennsylvania, this is even more acutely unfair. The median salary is on the lower end of average, and many patients are disabled, laborers, or elderly with fixed incomes. They cannot afford such expenditures.
2. **Removal of the 4:1 CRNP to Physician ratio:** ratios are arbitrary quotients established to place minds at ease. There is, quite frankly, no perfect number. Patient care cannot be compromised because of a ratio that cannot be maintained or one that is not ideal for the practice setting.

Advanced practice nursing has evolved to where the state of our nursing science offers the clinical Doctor of Nursing Practice, or DNP. I am proud to have been in the first class to have earned this degree from Columbia University: "Columbia University School of Nursing was the first program in the United States to offer the Doctorate in Nursing Practice degree, and has set the standard for excellence in this clinically based

doctoral program. Built on evidence derived from over 10 years of increasing independence and scientific inquiry, including a randomized trial published in The Journal of the American Medical Association, Columbia University School of Nursing faculty developed the DNP degree to educate nurses for the highest level of clinical expertise, including sophisticated diagnostic and treatment competencies. This degree builds upon advanced practice at the master's degree level and prepares graduates for fully accountable professional roles in several nursing specialties." (from http://cpmcnet.columbia.edu/dept/nursing/programs/drnp_approved.html).

My practice, my autonomy, and my ability to provide comprehensive, high quality, accessible AND affordable health care to my patients have been enhanced by my academic accomplishment.

Restrictions by our State Board of Nursing impede not only clinical nursing practice but inhibit the true growth of professional nursing science.

Without freedom, there is no growth. We have evolved far beyond arbitrary limits; condoning and perpetuating constrained prescriptive authority for Nurse Practitioners in Pennsylvania would be an absolute injustice to our patients and our profession.

I urge you, and in fact, I implore you: please allow the proposed changes. Together let us bring Pennsylvania Advanced Practice Nursing current with the state of the science, and in keeping with the needs of our patients.

Please do not hesitate to contact me with any questions or concerns. I will always try to make myself available to you.

Thank you for your consideration, attention, and hopefully, your support.

With Kindest Regards,



Dr. Patricia Maani

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cc: Mary O. Mundinger, Dean, Columbia University School of Nursing (sent via email 11.12.08)
Patricia Schwabenbauer, MSN, CRNP; President, Pennsylvania Coalition of Nurse Practitioners; PO Box 545, Mechanicsburg, PA 17055