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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Pennsylvania State Board of Nursing  
P.O. Box 2649  
Harrisburg, Pennsylvania 17105

State Board of Nursing:

I am a nurse practitioner practicing in the State of Pennsylvania in an inner city emergency department / urgent care setting and I am urging you to support the proposed rule making package of the State Board of Nursing pertaining to Certified Registered Nurse Practitioners General Revisions, 16A-5124.

These proposed changes will allow continued continuity of care and access of care for some of Pennsylvania's most vulnerable populations. Removal of the 4:1 NP to physician ratio will allow more patient access to nurse practitioners that practice in federally qualified health clinics, nurse-managed centers, and NPs who work in free clinics. I refer many of my patients to these types of clinics after their emergency department care and limiting access to such care would prove to be detrimental to the health care of these individuals. Also, without access to nurse practitioners in these clinics, patients may use the emergency departments for their routine care contributing to higher health care costs and overcrowding of the emergency departments.

The proposed changes also involve the prescribing of Schedule II, III, and IV medications. The new regulations will extend the NPs ability to prescribe Schedule II medications from 72-hour prescription to a 30-day prescription. This will help NPs to fully manage their patients' needs in relation to cancer treatment and care, palliative and hospice care, trauma cases, chronic pain management, behavioral / psych-mental health care. Currently, our regulations for prescribing schedule II prove to disrupt continuity of care for our patients and families and create an economic hardship for them. With limited schedule II prescribing, patients are required to make more trips to the pharmacy, additional trips to us as providers, all which require more co-payments and inconvenience for the patient.

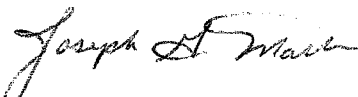
The provision to change Schedule III and IV prescribing will allow nurse practitioners to prescribe schedule III and IV medications from a period of 30-days up to 90-days. This change will allow NPs will be able to participate fully in their patients' insurance pharmacy benefit plan, which saves consumers excessive co-payments and helps to coordinate their medication needs.

Within my practice in the emergency department, I care for many patients almost on a daily basis, who have uncontrolled pain who resort to utilizing emergency and urgent care services to get relief. This use of services creates an unnecessary financial strain not only on the patient but also our society.

I am urging you to support the proposed changes so residents of Pennsylvania can continue to have access to nurse practitioners care. These proposed regulations will allow nurse practitioners to provide care to their full educational levels. Maintaining the current status creates a disincentive for patients to choose NPs for their primary or specialty care providers and is counter to what Governor Rendell intended with the passing of Act 48 in 2007.

Thank you for your attention to this critical issue. Pennsylvania nurse practitioners and patients need these proposed changes. Please feel free to contact me with any questions or concerns.

Thank you,



Joseph G. Mattis