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November 9, 2008

TO: Pennsylvania State Board of Nursing  
PO Box 2649  
Harrisburg, PA 17105

From: Susan Van Cleve, MSN, CRNP  
653 Harrogate Rd  
Pittsburgh, PA 15241

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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RECEIVED

Re: 16A-5124: CRNP General Revisions

Dear Board of Nursing Members!

The purpose of this letter is to convey to you my most sincere request for support of the proposed regulations for CRNPs as they have been proposed.

I am a Pediatric Nurse Practitioner and I work on the Child Development Unit and the Down Syndrome Center at Children's Hospital of Pittsburgh of UPMC in Pittsburgh, PA. My role involves evaluating and treating children and adolescents for Attention Deficit Hyperactivity Disorder (ADHD), Autism Spectrum Disorder, Developmental Delay, Behavioral Disorders, Anxiety, and Down Syndrome. Part of my practice involves treating children with psychostimulants, including Ritalin, Methylphenidate, Concerta, Metadate, Adderall and others. These medications are Schedule II medications and at present, CRNPs may only prescribe these medications for 72 hours, rather than 30 days which is the standard for physicians. Although I work in collaboration with physicians, I follow my own caseload of patients and have a schedule where

I see my patients independently. Because prescribing psychostimulants is part of our treatment plan for many of our patients, I must interrupt the physician to sign all prescriptions for these Schedule II drugs. This necessitates taking time from my busy patient schedule and from the physician's busy day to sign these prescriptions. It is well within my practice guidelines to prescribe these medications, determine the appropriate dose, and the time the medication should be administered. If I have a question, I will consult with the physician before prescribing the medication.

I urge you to pass the proposed 30 day prescription writing ability for CRNPs regarding Schedule II drugs. Passage of this regulation will enable me to be a more effective provider of care, and will improve continuity of care for patients.

Thank you for your consideration for this very important issue.

Sincerely,

Susan N. VanCleve MSN, CRNP