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

November 13, 2008

Dear Ms. Steffanic,

I am writing in response to the proposed changes to the CRNP Rules and Regulations (16A-5124 CRNP General Revisions). I have been an OB/GYN nurse practitioner in the state of Pennsylvania for 21 years and am currently working as a Clinical Services Coordinator at Planned Parenthood Southeastern Pennsylvania. In recent years, the role of the nurse practitioner has adapted and expanded in response to a stressed health care market. The stress coming from increased numbers of uninsured and under-insured individuals, as well as, the need for affordable health care.

As a nurse practitioner, I am against the 4:1 NP to physician ratio regulation. This rule is entirely unnecessary and decreases our ability to provide essentially needed, cost-effective healthcare. At Planned Parenthood SEPA, all clinicians, whether they are physicians, nurse practitioners, nurse midwives, or physician assistants, practice according to detailed protocols that have been established by national experts in women's healthcare. We employ over 30 midlevel clinicians to provide services in 11 health centers. To require a physician supervisor for every four clinicians is an unreasonable expectation, not only because of the decreasing numbers of physicians in Pennsylvania, but also because it does not serve any purpose. All of our clinicians have an annual performance review that consists of clinical observations and chart reviews, as well as a quarterly review of charts. In the rare instance that there is a problem with clinician performance, systems are in place for corrective action. Our Medical Director, or his designee, is available by phone at all times. There are also two Clinical Services Coordinators available 24 hours day.

While the need for prescribing Schedule II, III, & IV medications in our practice site is very limited, most nurse practitioners are seeing patients who might require these. The current limitations are a barrier to CRNP's doing their jobs. It is a barrier to patients having their needs met and increases their overall expenses with additional prescriptions or copays.

Nurse Practitioners have demonstrated their commitment to quality healthcare and meeting the needs of their patients. It is time that regulations were supportive of their practice and that restrictive barriers were eliminated.

Sincerely,

Sonja Anderson MSN, CRNP  
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