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Ann Steffanic, Board Administrator
State Board of Nursing
P. O. Box 2649
Harrisburg, PA 17105-2649

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ann Steffanic,

I have reviewed the proposed changes to our CRNP regulations and I have a few comments to share about how these regulations impact my practice. I am currently a CRNP working for DuBois Regional Medical Center in an OB/GYN practice that is comprised of one OB/GYN and me. I have concerns that if we are unable to make the proposed changes to prescribe schedule II medications for a period longer than 72 hours, that it will continue to impact my practice negatively. Currently if I am seeing a new post-operative patient for perhaps a C-section or Hysterectomy, I can only write for a schedule II pain medication for 72 hours. If the physician is unable to be present for that visit or even the next visit, due to an emergency, it means the patient has to come back for additional visits to pick up prescriptions, which are burdensome for the patients who are not allowed to drive for 6 weeks after surgery. They have issues with childcare as well. And as you know, schedule II narcotics can not be called into pharmacies over the phone. In a one physician OB/GYN practice it is not uncommon for the doctor to be called out of the office for deliveries and emergencies on a fairly regular basis. This inability to be able to write for a script which will cover the entire post-op recovery time for my patients greatly affects my practice.

I am also aware of many of my colleagues who work in other specialties that are limited in their ability to prescribe Schedule II medications, specifically in the areas of Oncology and Hospice. Other providers in family practice and pediatrics are limited by their ability to prescribe Schedule III and IV medications for up to 90 days.

I urge the reviewing entities to strongly consider how the new changes greatly impact our patients' access to quality care and continuity.

Sincerely,



Amy H. Veza C.R.N.P.