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University City Family Medicine

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INDEPENDENT REGULATORY
REVIEW COMMISSION

November 17, 2008

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

RE: CRNP Proposed Rulemaking

I am writing in support of the proposed new regulation that will extend the ability of nurse practitioners to prescribe Schedule II medications from 72 hour supply to 30 day prescriptions. The current restriction on only allowing 3 days of medication for Schedule II drugs is an inconvenience to patients and makes it difficult for me to efficiently treat patients with chronic pain. As it stands now, I have to interrupt my collaborating physician to get prescriptions signed for any patient who needs longer term pain management. This is an inefficient use of my time, an inconvenience to the patient and disrupts patient flow in the office. Many acute conditions, such as kidney stones or severe back pain could require more than 3 days of medication for the condition to resolve. If adequate medication is not prescribed, the patient could be forced to return for another visit, pay another co-pay and take up provider time which is not cost-effective in an already stressed primary health care setting. The current regulations do not serve the public well. In addition, it adds to confusion on the part of patients when most of their prescriptions are in my name and their pain medication are from my collaborating physician.

I am also in support of extending Schedule III & IV medications for up to 90 days. Many insurance companies require mail order prescriptions for chronic medications. Patients have to pay additional co-pays at this time since I am only able to prescribe a 30 day supply on Schedule III/IV medications. This increases costs and generates more work for everyone involved in caring for patients with pain.

I have worked as a family nurse practitioner for 25 years. The prescription changes proposed for nurse practitioners with greatly improve the efficiency and reduce cost of providing care. This change is long over due and will assist nurse practitioners in able to provide cost effective, patient focused quality care.

Sincerely,

Katherine Fleming Cohen, MS, CRNP VP001255B