



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

November 17, 2008

Dear Ms. Steffanic,

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 INDEPENDENT REGULATORY
 REVIEW COMMISSION

This letter is in response to 16A-5124 CRNP General Revisions.

I am writing to express my support for the proposed rulemaking that would update the regulations that govern CRNP practice in the Commonwealth. I reviewed the proposed rule and wish to express support for several points specifically:

- 1) Language the more clearly specifies that the CRNP is responsible for his/her own practice, and that relationship with the physician is consultative/collaborative. This helps to place Pennsylvania among the leaders in the U.S. in health care innovation with respect to this avenue of health care delivery.
- 2) Clarification of the collaboration agreement for practice and for prescriptive authority.
- 3) Removal of the ratio-based collaboration limits. This will allow local health care providers to determine appropriate skills mixes for the health care mission at hand, and the needs of citizens.
- 4) Schedule II prescribing for 30 days instead of 72 hours. This more clearly addresses the proper role of CRNPs in facilitating health care within a total health care system context, and will lead to greater safety and convenience for consumers while maintaining appropriate oversight opportunity.
- 5) Schedule II and IV prescribing for 90 days, for similar reasons, in addition to insurance cost savings for consumers in extended prescription coverage plans.

Overall, I judge that the rule changes as proposed will enhance access to safe, effective health care options for Pennsylvania's consumers. I thank the Board for their work on the proposed rules and for the opportunity to contribute comments. This letter of comment is provided by me personally, within my professional and academic capacity, and does not reflect the policy of the School of Nursing or Penn State University.

Sincerely,

R. Eric Doerfler, CRNP, PhD(c)
 Campus Coordinator