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INDEPENDENT REGULATORY  
REVIEW COMMISSION

November 14, 2008

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

Ref: 16A-5124: CRNP General Revisions

Ann Steffanic and the State Board of Nursing:

I am an emergency physician practicing in Pennsylvania and I am writing to support the proposed rule making package of the State Board of Nursing pertaining to Certified Registered Nurse Practitioners General Revisions, 16A-5124. These revisions are not an expansion of the scope of practice of nurse practitioners in Pennsylvania; however, they do remove some of the barriers to their practice.

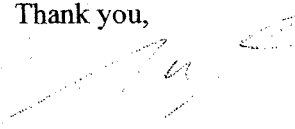
Within my practice in the emergency department, I care for many patients almost on a daily basis, who have uncontrolled pain who resort to utilizing emergency and urgent care services to get relief. This use of services creates an unnecessary financial strain not only on the patient but also our society.

The proposed change that may help with this issue, involves the prescribing of Schedule II, III, and IV medications by nurse practitioners. The new regulations will extend the NPs ability to prescribe Schedule II medications from 72-hour prescription to a 30-day prescription. This will help NPs to fully manage their patients' needs in relation to not only acute painful conditions and trauma care, but also cancer treatment and care, palliative and hospice care, chronic pain management, behavioral / psych-mental health care. Currently, the regulations for prescribing schedule II can disrupt continuity of care for NPs patients and families and create an economic hardship for them. With limited schedule II prescribing, patients are required to make more trips to the pharmacy, additional trips to healthcare providers, and many times additional trips to the emergency department, all which require more co-payments and inconvenience for the patient.

The provision to change Schedule III and IV prescribing will allow nurse practitioners to prescribe schedule III and IV medications from a period of 30-days up to 90-days. This change will allow NPs will be able to participate fully in their patients' insurance pharmacy benefit plan, which saves consumers excessive co-payments and helps to coordinate their medication needs.

As an emergency physician who does work closely with nurse practitioners, I am asking you to support the proposed changes so residents of Pennsylvania can continue to have access to nurse practitioners care and allow nurse practitioners to provide care to their full educational levels. Thank you for your attention to this critical issue. Please feel free to contact me with any questions or concerns.

Thank you,

  
Adam Yates, MD FACEP