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November 17, 2008.

Ann Steffanic  
Board Administrator  
Pennsylvania State Board of Nursing  
PO Box 2649  
Harrisburg, PA 17105-2649

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Steffanic,

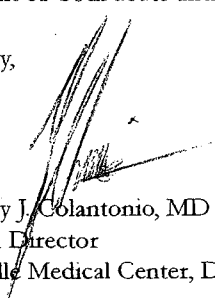
As an anesthesiologist specializing in pain management, I am writing in regards to proposed regulations of the State Board of Nursing. These were released for comment on November 8, 2008 and affect the practice of licensed nurse practitioners in the state of Pennsylvania. Specifically I support allowance of nurse practitioners to write 30-day prescription for Schedule II drugs and 90-day prescriptions for Schedule III and IV medications.

There is a shortage of physicians willing to treat chronic pain, both specialists and primary care providers. I see patients who drive over 2 hours for treatment for their pain. There is an eight to ten week waiting period for an initial appointment. If it weren't for my nurse practitioner the wait would be 3-4 months.

As an interventional anesthesiologist I am needed to perform complex pain relieving procedures. When I have to see patients to renew their Scheduled II analgesics I am not available to perform the procedures. Patients are then expected to wait 4-6 weeks for pain relief. This is where my nurse practitioner improves access to care. She makes appropriate recommendations in the pain management treatment plan. However, due to current regulations, patients have to wait until I am available to sign the prescription. Should I be in the middle of a procedure this could be 30 minutes or longer. If I am out of the office and a patient's prescription needs to be renewed he/she may have to go without medication. This results in loss of pain control, and often, symptoms of withdrawal and an inappropriate emergency room visit.

I urge you to remove this barrier to nurse practitioner practice in order to improve patient access to care and treatment of both acute and chronic pain.

Sincerely,



Anthony J. Colantonio, MD  
Medical Director  
Meadville Medical Center, Department of Comprehensive Pain Care