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November 18, 2008

Ann Steffanic, Administrative Asst.  
PA State Board of Nursing  
PO Box 2649  
Harrisburg, PA 17105

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Sir/Madame:

I am writing this letter in response to the CRNP regulations. As a CRNP I am deeply concerned that these regulations hamper my efforts to provide consistent quality care to my patients. I have patients in my practice who are currently receiving medicines that are schedule III and IV drugs. These patients are on these medicines for chronic pain conditions. Some of these patients are on limited incomes and therefore need any financial assistance they can obtain in order to afford their medicines. Many of them send for 90 day mail prescriptions because they are less expensive and save them time and money without having to drive to the pharmacy or arrange for a family member to pick up the prescriptions for them. Currently, I am only allowed to write for 30 day prescriptions and have to request that the patient come back to the office on a day when the physician is present and can write for the 90 day prescription. This is an inconvenience for the patient and a delay in care.

Also, there have been instances where I was unable to prescribe adequate pain medicine for an acute problem. I had gentlemen who came to my office with renal calculi (kidney stones). This condition causes intermittent extreme pain suddenly and often literally renders the patient incapacitated from pain until the stones are passed. It can take up to 2 weeks for the patient to pass the stones through the urinary tract. Narcotic pain medicines are generally prescribed to alleviate the pain. Currently the regulations in place state I can only prescribe 3 days worth even though the pain may continue for up to 2 weeks or more. The patient either has to go to the ER or return to my office for another prescription. As a past Emergency Room nurse, our emergency rooms are overcrowded. Sending a patient to the emergency room for pain medicine is a further burden on both the patient and the ER and could be prevented. Another patient I diagnosed had cellulitis of the right lower leg. This is a skin/tissue infection that can cause great pain. It can take weeks or more for the infection to resolve. Again I am restricted in only prescribing 3 days worth of medicine even though the pain may continue for a week or more.

Please consider removal of these current regulations. Not only will it improve our patient's quality of life but it will allow us to give timely consistent care to the patients that need it most. Thank you for your assistance in this manner.

Sincerely,

  
Linda Hablitz CRNP MSN RRT