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INDEPENDENT REGULATORY
REVIEW COMMISSION

PennCare-
University City Family Medicine

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Lisa J. Schaffer, D.O.
Tamiara Welch, M.D.

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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 the nurse practitioner in my office to efficiently treat patients with chronic pain. As it stands now, the nurse practitioner has to interrupt me to get prescriptions signed for any patient who needs long term pain management. This is an inefficient use of my time when she is fully qualified to safely prescribe medication under her license. I am also in favor of extending Schedule III & IV medications for up to 90 days. Many insurance companies require mail order prescriptions for chronic medications. Patients are forced to pay more co-pays if medication is given for 30 days rather than 90. This increases costs and generates more for work for everyone involved in caring for patients with pain.

I have worked with nurse practitioners for over 15 years and currently have a collaborative agreement with A. Katherine Fleming Cohen, MS, CRNP. I fully support the proposed regulation changes to assist our office in providing safe, efficient, cost effective care to our patients.

Sincerely,

Dana Greenblatt, MD