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16A-5124: CRNP General Revisions
Attn: Ann Steffanic, Board Administrator
State Board of Nursing
P.O. Box 2649
Harrisburg, Pa 17105-2649

November 17, 2008

To Whom It May Concern:

I am writing in response to proposed CRNP Rules and Regulations changes.

1. Removal of 4:1 NP to physician ratio

NPs practicing in federally qualified health clinics, free clinics, nurse-managed centers may be burdened in the future to find collaborating physicians. We were recently told at a meeting that only 4% of medical school graduates are pursuing family practice. In addition, to have a collaborative agreement for prescriptive authority it is required to have 2 physicians to legally practice. Again, the current and future implications are overwhelming. Will access to care be limited by this ratio? The answer appears to be yes.

2. Prescribing medications

NPs are currently limited in the prescribing of schedule II-IV medications. For example, I see some children and adults in my family practice with attention deficit disorder. Medications to treat this disorder are schedule II and I can only prescribe for 3 days. Parents must return to get a prescription from the physician and his next time in the office. This type of prescription cannot be mailed or called in. This could create difficulty for parents with time lost from work or disruption of the child's therapy. If a parent needs a refill only and calls in to come pick up the prescription (which they must do monthly) I cannot do the refill. Again, it must wait for a physician provider to be available.

For schedule III and IV medications, I cannot order a 3 month supply which is often preferred by the insurance company and saves the consumer money.

Although I am sure there is some resistance from the physician community, someone needs to step forward and look at the big picture and protect the citizens of Pennsylvania. What are the physician's worried about-that NPs might take business from them? This is obviously not something for them to be concerned about. Are they worried about credibility? We are required to prove pharmacy credit hour education, update that education yearly, and take a licensing exam. Governor Rendell is trying to increase access to healthcare in the Commonwealth of Pennsylvania. The measures listed above will increase access and affordability of health care to citizens of Pennsylvania.

If I can be of any further assistance or answer any questions, please feel free to contact me at 717-544-4912, ext. 76974.

Sincerely,

Dolores A. Minchhoff, MS, FNP-BC, RN

INDEPENDENT REGULATORY
REVIEW COMMISSION

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