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Frank Kosnosky Jr.

220 Rean Street  
Johnstown, PA 15904

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

November 20, 2008

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

Dear Ms. Steffanic:

As a registered nurse and nurse practitioner student, I am writing to strongly support all the revisions to CRNP practice in the Commonwealth of Pennsylvania (16A-5124: CRNP General Revisions). I see the proposed revisions as a tool that will enable easier access to healthcare for the residents on our state. Unnecessary restrictions that regulate nurse practitioner healthcare delivery that are now in place add to the burden on our healthcare system, consume large amounts of time, and really have no positive impact on patient care. It has been proven that nurse practitioners provide safe, competent, and quality healthcare. Patients are satisfied with the bond they can form with their nurse practitioner and the outcomes of the healthcare they receive.

I support removal of the 4:1 NP to physician ratio. This ratio does nothing to ensure safe healthcare. It instead causes a decrease in able providers at many locations and creates unnecessary burdens on the providers that are able to practice in that area. Since there already is a shortage of physicians in Pennsylvania, this would lead to an increased burden for practicing NPs.

Schedule II prescriptive authority needs to be expanded to meet the needs of the patient the NP sees. During my clinical rotations, I have seen the NP examine, diagnose, and attempt to treat the patient, only to be limited when it comes to writing the prescription. Many patients need long term narcotic pain control, or psychoactive medications such as Ritalin or Concerta to manage ADD symptoms. The NP would have to, at the very least, disturb a physician in the practice, who is already seeing another patient, to obtain a signature. In other cases the patient may have to wait till the next day for a physician signature or for the prescription to be called in by the physician. This just creates a situation of wasted time and stifles the continuity of healthcare within a practice. A NP is perfectly able and qualified to order a schedule II drug, whether it be three days or 30 days.

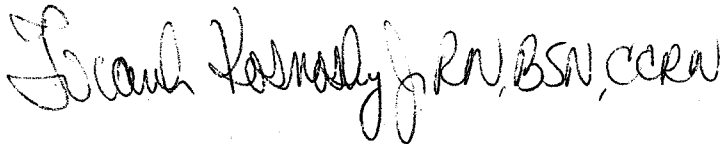
Also, the physician notification element does nothing to improve healthcare or make it safer. It is just another restriction or obstacle that hinders timely healthcare and causes redundant work. Any prudent healthcare provider whether it be a nurse practitioner or a physician would notify someone or refer a situation that is above their expertise to another provider who can deal with the situation better. This could be nurse practitioner to physician referral or physician to physician referral. Just because a nurse practitioner needs to write a prescription for 30 days of a schedule II drug doesn't mean there is a need to notify someone else. They saw the patient, determined the need for the medication, and can safely prescribe it on their own, without a need for physician notification. If there were

concerns or questions beyond their level of expertise, then the nurse practitioner would gladly refer to another provider.

Also, schedule III and IV drugs should be able to prescribed for 90 days at a time. Health insurance co-pays, wasted time at the pharmacy, and the inconvenience on the part of the patient would all be decreased. This is cost-effective, easily accessible healthcare for Pennsylvania. It is unreasonable and wrong to think that a NP cannot safely provide this treatment modality to his/her patients.

I encourage you to promote the safe, high quality healthcare provided by nurse practitioners. The citizens of Pennsylvania will truly benefit from the removal of these barriers to healthcare services. They will realize better continuity of care, decreased healthcare costs, and the community as a whole will be better served. I urge you to allow the changes described in the CRNP general revisions (16A-5124). I strongly support all the changes proposed in the revision document. It will make a better Pennsylvania and build a stronger future.

Sincerely,

A handwritten signature in black ink that reads "Frank Kosnosky Jr., RN, BSN, CCRN". The signature is written in a cursive style with a large initial "F".

Frank Kosnosky Jr., RN, BSN, CCRN, FNP Student