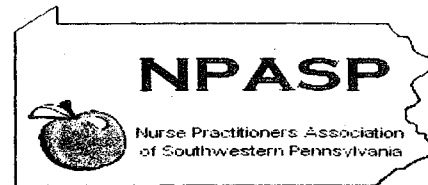


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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

November 25, 2008

On behalf of the Nurse Practitioners of Southwestern Pennsylvania, we would like to respond in support of the revisions noted in the recently proposed regulations in the Pennsylvania Bulletin. NPASP has organizational contact with over 300 nurse practitioners caring for patients in the southwestern area of the state. It has been demonstrated that we provide quality, cost effective health care in hospitals, clinics, ambulatory and specialty practices.

The role of the nurse practitioner continues to evolve as we respond to the changing health care environment. Barriers to practice such as the 72 hour limitation for schedule II drugs cause patients a hardship and often do not align with their insurance coverage. The 30 day time frame will allow the CRNP to effectively and efficiently manage their pain care needs. Increasing schedule III drugs to a 90 day supply will also facilitate use of mail order prescription plans which are more cost effective. It is both an ethical and professional responsibility to provide pain management to our clients.

We also support the Board recommendation to consider removal of the 4:1 ratio presently in effect for CRNP's and physicians. CRNP's do not require supervision or physician presence to practice and this ratio is a detriment to providing care for those who do not have access to care.

The Nurse Practitioner Association of Southwestern Pennsylvania supports the proposed Pennsylvania State Board of Nursing Rules and Regulations.

A handwritten signature in cursive script, appearing to read 'Eileen O'Toole', is written over the typed name.

Sincerely,  
Eileen O'Toole CRNP, DNPs  
President NPASP