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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 19105-2649
Ref. # 16A-5124 CRNP General Revisions

To Whom It May Concern:

As a registered nurse in the Department of Family and Community medicine at Thomas Jefferson University, I am witness to the day to day practices of the CRNP's within our outpatient facility.

It is my understanding that in an effort to improve the ability of nurse practitioners to provide high quality, safe care to their patients, the regulations that mandate the practice of nurse practitioner's have been updated. I am writing in support of these rule making changes that have been proposed for my CRNP colleagues. Specifically, as follows:

1. Removal of the 4:1 CRNP to physician ratio.

This random 4:1 ratio is a limiting factor for the CRNP's in our practice. The goal is to provide continuation of care to our patients, and by having this ratio, patient access to their primary provider becomes limited.

2. Increase the prescription length for schedule II Controlled substances from 72 - hours to 30 days.

By extending the length of prescription writing for controlled substances from 72 hours to 30 days, it will enable the patient's of our CRNP's to have the same level of medication management as patient's of other providers in our practice. By limiting the supply of medication, there are frequent interruptions, making the medication management of these patient's more difficult, less effective and more time consuming.

3. Increase the prescription length for schedule III and IV medication from 30 days to 90 days.

By increasing the length of prescriptions written by CRNP's from 30 to 90 days, we will be enabling their patients to take advantage of the full benefit of the prescription coverage; whether that means only paying one co-payment every three months for their medication, or using their mail-order prescription services.



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In summary, I am in support of these revisions to the CRNP regulations which govern CRNP's in the State of Pennsylvania. Nurse practitioner's provide a large population with primary patient care and over time have proven themselves in their ability to provide high quality, cost effective care with a high level of patient satisfaction. These regulation changes will only allow this high quality of care to continue for their patients.

Sincerely,

Lori Conley, RN, CCRC
Clinical Trials Coordinator