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November 20, 2008

Pa. State Board of Nursing
Attn: Ann Steffanic, Board Adm.
P.O.Box 2649
Harrisburg, Pa. 17105

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RE: 16A-5124 CRNP General Revisions

INDEPENDENT REGULATORY
REVIEW COMMISSION

I am writing this letter today to congratulate the Nursing Board on the regulations supporting Act 48 to allow nurse practitioners like myself to better serve our patients. For the last 16 years I have been seeing and treating adult substance abuse patients in a multidisciplinary team to provide outpatient detoxification and early recovery services to promote sobriety. At the same time with several other CRNP's, we have provided needed episodic and chronic disease management of these patients who, by virtue of their addiction, are often disenfranchised from mainstream health services.

The provision to allow CRNP's to extend schedule II and III prescribing benefits our patients in the detox process and we keep a tight rein on the patients so they receive the maximum support of alcohol withdrawal for example, and we monitor them closely for problems. I have colleagues in other practices, notably in provision of hospice and palliative care services, whose patients would be better served by getting quicker and easier access to pain relief. I have been a CRNP for 17 years and have traveled this state as representative for the state NP group. All the CRNP's I have ever met do collaborate with physicians and refer patients when more complex problems arise. I do not believe this will change our impressive safety record with patients.

I am in favor of simplifying the collaborative agreement with one primary collaborating physician in view of the physician shortage statewide and the statistics predicting few medical students training for primary care medicine in the future. I think an oral agreement is more than adequate if a CRNP is not prescribing as health care is dynamically changing and we need to be able to meet our patients' changing needs.

In closing I fully support these regulations for CRNP practice. I ask that they be accepted as written in order to benefit our state constituents in keeping with the Governor's health care reform proposals to allow us to practice to the fuller extent of our education and training to maximize excellent health care to Pennsylvania patients.

Yours truly,



Louise Epperson, MSN, CRNP