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November 25, 2008

Ann Steffanic, Board Administrator
State Board of Nursing
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Steffanic:

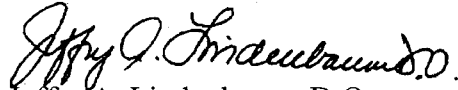
The Pennsylvania Osteopathic Medical Association has reviewed the proposed Certified Registered Nurse Practitioner (CRNP) regulations, and our physicians are greatly concerned regarding the permitting, removing or requiring of the following items:

- Permitting non-prescriptive authority collaborative agreement to be oral, thus leaving no proof of what was agreed to by the parties to the agreement, or permitting anyone to review the agreement to determine if it is appropriate for the CRNP's scope of practice.
- Removing the definition of "direction," which includes the elements of the collaborative relationship, including the level of physician availability and involvement.
- Removing the requirement for a collaborating physician to attest that he/she has knowledge and experience with any drug the CRNP will prescribe.
- Removing the requirement for specifying conditions where the CRNP may prescribe Schedule II controlled substances for up to 72 hours and increasing the time limit to 30 days.
- Removing the requirements for patient notification that they will be seeing a CRNP at the time of their appointment, and for a CRNP with a doctoral degree to inform patients that he/she isn't a physician -- D.O. or M.D.
- Removing the CRNP/collaborating physician ratios; and
- Requiring that the CRNP only need to use "CRNP" on name badge without spelling out what it means.

Thank you again for the opportunity to express our concerns regarding the proposed CRNP regulations. As an organization, POMA's primary concern is for the health, care and well-being of the patients we serve, and not the economic benefits of individual physicians or groups.

If you have any questions, please feel free to contact us at the number listed above.

Sincerely,



Jeffrey A. Lindenbaum, D.O.
President



Kieren P. Knapp, D.O.
Vice Chairman, Legislative Committee

- c: Senator Robert M. Tomlinson, Chair, Consumer Protection & Prof. Licensure Committee
Representative P. Michael Sturla, Majority Chair, Professional Licensure Committee
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