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November 29, 2008

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

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INDEPENDENT REGULATORY REVIEW COMMISSION

## Letter Regarding 16A-5124: CRNP General Revisions

Dear Ms. Steffanic:

I write to you on behalf of Lenape Valley Foundation to express our support for the proposed regulatory revisions to amend Pennsylvania Code Chapter 21, Subchapter C (16A-5124: CRNP General Revisions).

Lenape Valley Foundation has provided mental health services to residents with mental health needs in Bucks County for 50 years. There are two nurse practitioners providing care there.

The proposed revisions to Pennsylvania's CRNP regulations will help centers provide high-quality primary care to low-income and underserved people in a more efficient way. By removing the 4:1 maximum NP-to-physician ratio that currently exists in the regulations, we will have less difficulty finding enough physicians who are willing to enter into collaborative agreements with the CRNPs in Pennsylvania health centers.

In addition, the proposed regulations will help us provide better, more cost-effective care to low-income patients who need Schedule II, III, and IV drugs. Current regulations that restrict CRNPs' ability to prescribe Schedule II, III, and IV drugs create a special financial burden for our low-income patients, who must refill their prescriptions (and pay the associated co-pays) more often than patients of physician-run safety net clinics. The proposal increases access because patients do not have to wait for appointments with psychiatrists, who are in short supply, to get Schedule II, III, or IV drugs. Revising regulations regarding CRNP prescriptive authority with regard to Schedule II, III, and IV drugs will help relieve an unnecessary financial burden on low-income and Medical Assistance-eligible patients.

In addition to these specific comments, we would also like to note that we support these proposed changes in their entirety. If adopted, these changes will help nurse practitioners provide care to Pennsylvania's low-income and vulnerable populations more efficiently and effectively.

Thank you for the opportunity to submit these comments to you. If you have any questions, please feel free to contact me at cell phone number 215.589.5910.

Sincerely,

Steven Weiss, R.N., M.S.N., CRNP