



# PRIORITY CARE

Occupational Health Services/  
Urgent Care Medical Center

2729

December 1, 2008

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

Ref: 16A-5124: CRNP General Revisions

Ann Steffanic and the State Board of Nursing:

I am writing to lend my support for the proposed revisions promulgated by the State Board of Nursing pertaining to Certified Registered Nurse Practitioners General Revisions, 16A-5124.

I am a practicing occupational health/ urgent care physician, working in an independent, freestanding health care center. In this setting I work closely with an experienced CRNP and am well aware of the challenges that face their practice.

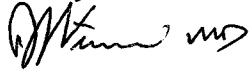
The key points that I have reviewed and support are as follows:

1. Allow 30 day prescriptions for schedule II controlled substances, from the current 72 hours rule. My practice involves treatment of acute and chronic pain patients on a daily basis. This change would eliminate the current roadblock for our CRNP prescribing pain medications within the health care center.
2. Allow 90 day prescriptions for schedule III-IV controlled substances for the current 30 day rule. This benefits the patient by allowing them to use the 90 day medical insurance mail order plans when appropriate. Both above changes allow for improved compliance by limiting additional co-pay and inconvenience for the patient.
3. Elimination of the 4:1 requirement physician-to-CRNP ratio. Although this does not directly affect my practice environment, I can see how it would impact other areas, such as Federally Qualified Health Centers, Family Planning Centers and free clinics. I also understand that currently there are 23 other states that have no ratio or mandated collaborative agreement. Contract agreements have always existed between the healthcare employer and the CRNP before mandated collaborative agreements existed.

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With the new guidelines in place, Pennsylvania becomes more progressive in being able to provide quality healthcare to those in need. I see the intent of these revisions as removing barriers to the CRNP practice of healthcare.

Thank you,

A handwritten signature in black ink, appearing to read 'D. Viscusi' with a stylized flourish at the end.

Donald Viscusi, M.D.

Medical Director, Owner  
Priority Care  
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cc.

Arthur Coccodrilli  
Chairman, Independent Regulatory Review Commission  
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