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INDEPENDENT REGULATORY
REVIEW COMMISSION

Ms. Ann Steffanic Board Administrator Pennsylvania State Board of Nursing PO Box 2649 Harrisburg, PA 17105-2649

RE: 16A-5124 CRNP General Revisions

Dear Ms. Steffanic:

I am writing in support of the above referenced revisions to the Nurse Practitioner practice parameters. I am a registered nurse in an oncology setting in Northeastern PA. I am also a student at University of Pennsylvania in the Adult Oncology Nurse Practitioner Program.

The decision to become a Nurse Practitioner was a difficult choice because of the time, money and commitment needed to be successful in the program. However, because I could see a clear need for Nurse Practitioners and the care provided to the patients in our office I did make the commitment. As an RN and student it is clear to me that the services provided by Nurse Practitioners are essential to the complete care of the patient.

In our office, the physicians are excellent, both knowledgeable and caring. However, they only have so much time for each patient. The Nurse Practitioners are able to provide the day to day care the patient and the family needs to complete treatment and maintain quality of life. I would like to address proposed revisions in regulations that will directly affect our practice and the level of care provided to our patients.

1. Schedule II Prescribing

Limits on prescribing authority for Schedule II drugs may currently cause an obstacle in the pain management of many patients. The prescriptions must be picked up and brought to the pharmacy. To do so for a limited number of days and then ask the patient or family member to return for the full prescription is both time consuming and difficult for many.

Any delays in receiving pain medications may have a significant negative impact on the patient's health and well being. Pain control is often the only means available to the patient to maintain quality of life during treatment or disease progression. There is no way to appropriately emphasize the value of pain management in the oncology setting.

2. Schedule III & IV Prescribing

Managing the medications for our patients is a very important aspect of patient care. A substantial number of prescriptions from our office are medications the patient will be on for months, years or even permanently. Many of our patients are on fixed or limited incomes and find it necessary to take advantage of savings from mail order prescription services. These must be 90 day prescriptions to get any real savings.

When the patient calls in for refills on a prescription, waiting for a physician to be present and then have the time to complete the prescription for a 90 day supply is a delay that could easily be avoided. The Nurse Practitioners are in our office all day, everyday and could order and refill prescriptions without delay.

Nurse Practitioners have completed extensive education and training and then passed exams that verify their knowledge and proficiency. Current regulations then limit their ability to perform job duties and provide the level of care appropriate for this specialized patient profile. The proposed changes to the regulations are appropriate and necessary to provide the continuum of care deserved by all patients.

Thank you for your help and consideration in this matter.

Sincerely,

Katherine E. Arensmeyer, RN, OCN

Graduate Student Nurse Practitioner

University of Pennsylvania School of Nursing