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INDEPENDENT REGULATORY
REVIEW COMMISSION

November 24, 2008

Ann Stephanic, Board Administrator
Pennsylvania State Board of Nursing
PO Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Stephanic:

I am writing regarding the proposed regulatory changes to nurse practitioner practice. I am the CEO of a community based agency providing behavioral health and intellectual disability services to children and adults. The proposed regulatory changes would be extremely beneficial to our organization and the people we serve.

Currently, we employ two CRNPs with specialty certification in Psychiatric/Mental Health Advanced Practice nursing. Both have experience in addictions care, and do not routinely prescribe scheduled medications. However, they frequently receive referrals to treat adults with co-existing mental health and addictions diagnoses, and need to gradually wean patients from scheduled medications. The current regulation limiting the prescription of Schedule III drugs interferes with their ability to safely manage these complicated individuals.

We also provide behavioral health care to children and adolescents, a distinctly underserved population in the state of Pennsylvania. The current restrictions on the prescription of Schedule II drugs for the treatment of children and adolescents with diagnoses of ADD and ADHD inhibits our ability to provide access to care.

With the limited pool of psychiatrists in our communities, it is difficult to meet the needs of the individuals who come to us for service. CRNP's have been a welcome addition to our practices. We have encountered barriers to utilization of our nurse practitioners to the full scope of their education and experience. We strongly encourage the Board to adopt the 16A-5124 CRNP General Revisions, and free our CRNPs to practice to their full capabilities.

Sincerely,

Susan C. Blue
President and CEO