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November 19, 2008

RECEIVED 2008 DEC - 9 PM 1: 54 INDEPENDENT REGULATORY REVIEW COMMISSION

Dear Ann,

As employees of a drug & alcohol rehab, we are writing a letter for our concerns. Joseph Marra Jr. CRNP is currently employed at the same site as well since 11/29/06. He has proven to be an asset to the company. However, there are some limitations due to current regulations. Buprenorphine is prescribed for some of the clients entering treatment. However, the regulations state a CRNP is unable to due so. This produces limitations and increases cost in order to pay a physician to have a face to face assessment with the client and sign the orders prior to administering. Secondly, the current need for a CRNP to collaborate with a physician. Again, this causes an increase in healthcare costs due to the inability to practice independently. Third, the current limits to prescriptive authority. If given full prescriptive authority, it would be highly beneficial at the inpatient, outpatient and office setting. Last, we believe the CRNP should have admitting privileges. When choosing a provider you don't want someone else stepping in who doesn't know your history. Not only do you have to pay this physician but you are not receiving continuity of care.

In addition, we believe all of the mentioned above limitations should have some requirements. This should include 2 years experience, at least 1 year in the family practice setting and at least 1 year experience in the drug and alcohol/mental health field. In addition, the proper trainings and certifications should be obtained. We believe if the limitations decreased or were lifted, this would decrease overall healthcare costs and better allow the nurse practitioner to provide a holistic, continuity of care. If the limitations were lifted we would be inclined to employ additional CRNP's due to the cost effectiveness.

Thank you for your consideration in these matters.

Sincerely.

Bernadette Grove, RN, ADON Shannon Grove, RN, DON