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Pennsylvania State Board of Nursing
c/o Ann Steffanic
Board Administrator
PA State Board of Nursing
P.O. Box 2649
Harrisburg, PA 17105-2649

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Dear Pennsylvania State Board of Nursing:

As a University of Pennsylvania nurse practitioner student, I am concerned about two specific statutes in the proposed rules and regulations for CRNPs that will soon be reviewed, and believe that they should be changed.

Firstly, I believe that the 4:1 NP to physician ratio should be removed. The Bureau of Labor Statistics projects a shortage of 212,000 physicians nationwide by the year 2014, with primary care most affected. As you know, NPs have been clinically strong in the field of primary care, and will undoubtedly continue to fill these gaps. This effort to serve in the primary care field will be hampered, however, by the 4:1 ratio.

Secondly, I believe that a NP should be able to prescribe class II drugs for a 30-day period, rather than a 72 hour period. This cumbersome rule requires the patient to make additional trips to the provider's office, and the pharmacy, for which more co-payments may be incurred. The increased payments, lost wages due to traveling, and disruption in continuity of care translates to poor care and possibly worse outcomes. Moreover, in the physician shortage described above, physicians are sometimes simply unavailable, especially in rural and high-need areas.

Thank you for continually supporting NPs in our continued effort to provide quality care to the citizens of Pennsylvania and beyond. I hope that you will consider the statements above while revising the CRNP regulations.

Sincerely,



Darleen Chien, BS, BSN, RN, MSN (AHNP) Candidate '09

Cornell University-College of Human Ecology
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