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2008 DEC -9 PM 1:56

INDEPENDENT REGULATORY  
REVIEW COMMISSION

December 1, 2008

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

Ref: 16A-5124 CRNP General Revisions

Dear Ms. Steffanic and the State Board of Nursing:

I am a registered nurse at the Hospital of the University of Pennsylvania and also a nurse practitioner student at the University of Pennsylvania. I am writing to voice my support for the revisions to Certified Registered Nurse Practitioner regulations.

As a nurse at a large hospital in the heart of Philadelphia, my utmost concern is for the access to and efficient delivery of quality health care for underserved populations. The current regulations are inhibitory to the hundreds of Pennsylvania nurse practitioners that also share my goal. First, the 4:1 nurse practitioner to physician ratio is the most detrimental to NPs that work with the lowest income populations such as Planned Parenthood and federally qualified health clinics (FQHC).

Second, the 72 hour restriction on Schedule II drugs are detrimental to patients' access to necessary relief from disease and disease symptoms, for instance mental health conditions and pain from trauma. Third, the 30 day prescriptive restriction on Schedule III and IV drugs should be expanded to 90 days in order to better serve patients. For instance this expansion would help decrease excessive co-pays and office visits.

In my experience as a floor RN on a general medicine floor I have seen many patients with poorly controlled chronic pain. In most cases they are admitted from the emergency room. If access to CRNPs is widened and CRNPs' schedule II, III, and IV prescriptive rights are extended many of these cases could be avoided. Thank you for your time and consideration to this important issue.

Sincerely,



Grace E. Paik, R.N.