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INDEPENDENT REGULATORY
REVIEW COMMISSION

2729

December 2, 2008
Ann Steffanic
Board Administrator
Pennsylvania Board of Nursing
PO Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Steffanic:

I am writing to you in support of the proposed changes in the regulation of Certified Registered Nurse Practitioners (CRNPs or NPs) [16A-5124 CRNP General Revisions]. I believe all of the proposed changes are good ones that will not only benefit members of this health profession, but also improve access to and quality of care provided to patients throughout the Commonwealth of Pennsylvania.

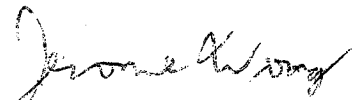
In particular, I believe that the proposed changes to the Medical Doctor (MD) to CRNP ratio and the ability to prescribe controlled substances are the most important. The removal of the 4:1 MD to NP ratio is good because that removes a constraint on NP practice; not only is there a nursing shortage but an MD shortage as well. There are currently too few practicing MDs available to fulfill the requirements of that 4:1 ratio, which artificially depresses the number of places an NP can work at. This is especially important in free clinics like the Health District clinics in Philadelphia; practice sites like these will continue to be understaffed for their respective patient loads unless this constraint is removed and these sites are free to hire more NPs to help fill the need for more providers to improve patient access to health care.

I also believe that expanding the ability of NPs to prescribe Drug Enforcement Agency (DEA) scheduled medications is important to improving access to health care. The proposed change to expand Schedule II prescribing from 72-hour supply to a 30-day prescription, which more accurately matches the federal guidelines, is especially important for NPs who work with children with attention deficit disorder or NPs who work in palliative care settings. The latter is most important for improving access to

adequate pain relief for those who would otherwise be living in agony of inadequately controlled pain.

Therefore, I write to you in support of these proposed rules changes, and hope that these will go into effect within the next year. Thank you for taking the time to read this letter.

Sincerely yours,



Jerome Wong

University of Pennsylvania

School of Nursing