

Neurological Surgeons

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2729

December 1, 2008

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

RE: 16A-5124
CRNP General Revisions

INDEPENDENT REGULATORY
REVIEW COMMISSION

2008 DEC -9 PM 1:45

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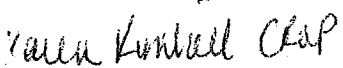
Dear Ms. Steffanic:

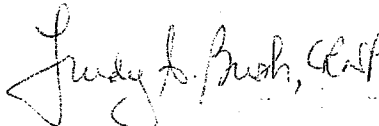
We are certified family and adult nurse practitioners working in a private neurosurgical practice. The proposed CRNP regulation changes are very relevant to us and our patients. We care for many patients who are experiencing acute or chronic pain. Schedule II, III and IV opioids are integral to the comprehensive, conservative management of that pain. Under the current CRNP regulations we are unable to provide routine prescriptions of Schedule II opioids for our patients who require a monthly prescription.

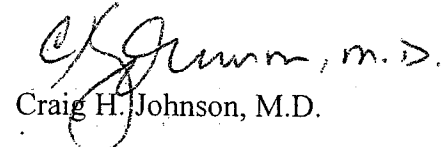
We are also unable to provide cost-saving 90-day prescriptions of Schedule III and IV opioids for our patients with insurance benefit plans that would cover these medications. They are unable to benefit from lower cost prescriptions and must bear the burden of excessive co-payments.

We, and our collaborating physician, Dr. Craig Johnson, believe that a change in the CRNP regulations would be significantly beneficial to all patients in this day of rising health care costs and economic downturn. Thank you for your consideration in this matter.

Sincerely,


Karen Kimball, C.R.N.P.


Trudy A. Bush, C.R.N.P.


Craig H. Johnson, M.D.