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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms Steffanic and the State Board of Nursing:

I am writing as a Certified Registered Nurse Practitioner in Pennsylvania who is currently unable to fully provide the healthcare to my patients, and concerned with the proposed changes the CRNP regulations.

I am working under a collaborative practice agreement with the eight physicians of the Medical Oncology Hematology Associates practice at Albert Einstein Medical Center in the Cancer Center, and have a collaborating physician. I am an adjunct professional staff member of Albert Einstein Department of Medicine and must complete the credentialing process every 2 years.


All scripts, letterhead and ordering forms have all the MOHA providers: physicians and nurse practitioners listed and all have privileges throughout the Einstein Healthcare Network.

The need to improve access to care is well known, but many are unaware of an existing barrier to providing care to patients experiencing disease-related pain, especially cancer patients. Currently, **The Pennsylvania Code Chapter 21 State Board of Nursing Subchapter C. Certified Registered Nurse Practitioners § 21.284. Prescribing and dispensing parameters, states:**  
(e) Restrictions on CRNP prescribing and dispensing practices are as follows: (1) A CRNP may write a prescription for a Schedule II controlled substance for up to a 72 hour dose. The CRNP shall notify the collaborating physician as soon as possible but in no event longer than 24 hours. Schedule II controlled substances include; oxycontin, percocet, morphine, fentanyl etc.

Therefore, I am unable to provide the care to my patients they require and deserve. I am able to prescribe and adjust their chemotherapy and treat all side effects and co-existing conditions but not their pain. The patient and physician are affected by this current standard as is the efficiency of my practice.

Thank you for the opportunity to address the Board with my concerns regarding the current and future CRNP regulations in Pennsylvania.

Sincerely,



Nancy J. Leahy, RN MSN CRNP AOCN®  
Nurse Practitioner