

PCPA



Pennsylvania
Community
Providers
Association

Building 3, Suite 200 ▶ 2101 North Front Street ▶ Harrisburg, PA 17110-1063
Tel: 717-364-3280 ▶ Fax: 717-364-3287 ▶ mail@paproviders.org ▶ www.paproviders.org

2729

December 4, 2008

Ann Steffanic
Board Administrator
State Board of Nursing
PO Box 2649
Harrisburg, PA 17105-2649

INDEPENDENT REGULATORY
REVIEW/COMMISSION

2008 DEC -9 PM 1:53

RECEIVED

Re: No 16A-5124 (CRNP general revisions)

The Pennsylvania Community Providers Association (PCPA) submits the following comments on Pennsylvania Board of Nursing Proposed Rulemaking, No 16A-5124, CRNP General Revisions. PCPA is a statewide trade association whose mission is to promote a community-based, responsive and viable system of agencies providing quality services for individuals receiving mental health, intellectual disabilities, addictive disease and other related human services. The association represents approximately 220 community-based providers and related organizations that offer and support mental health, intellectual disabilities, and substance abuse services. Member agencies cover all 67 counties in the Commonwealth and serve an estimated one million Pennsylvanians each year. As such, PCPA is in a uniquely qualified position to discuss the availability and accessibility of community-based services to persons with mental illness, intellectual disabilities, and addictive disease.

PCPA supports the proposed revisions to Title 49, Chapter 21 requirements for certified registered nurse practitioners (CRNP) that were published in the *Pennsylvania Bulletin*, Vol 38, No 45 on November 8. The following points are particularly appreciated:

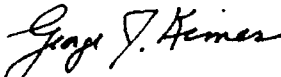
- Changes permitting prescribing of Schedule II controlled substances for up to 30 days instead of the current 72 hour limitation and for Schedule III or IV controlled substances for up to a 90-day supply instead of the current 30-day limitation, allowing individuals who have difficulty with transportation to have a cost effective means to continue needed medications, are very helpful.
- Permitting CRNPs to request, receive, sign for, and distribute professional samples to patients is very beneficial to the clientele served in many PCPA member programs.
- Allowing CRNPs to prescribe or dispense drugs for off-label use is also beneficial.
- Given the difficulty that many programs have with physician recruitment and retention, expanding available resources by permitting CRNPs to perform comprehensive assessments and medical diagnoses, order and interpret diagnostic tests, make referrals,

PCPA promotes a community-based, responsive and viable system of agencies providing quality services for individuals receiving mental health, mental retardation, addictive disease and other related human services.

develop and implement treatment plans, and complete admission and discharge summaries, among other added capacities is essential.

Some PCPA members use certified registered nurse practitioners to great effect. Others are somewhat concerned with their utility given the limitations imposed by various behavioral health program requirements. PCPA applauds this proposed expansion of the scope of services permitted CRNPS and encourages the Department of Public Welfare and the Office of Medical Assistance Programs to update requirements to allow CRNPs to practice to the full extent of their scope of practice within behavioral health programs.

Sincerely,



George J. Kimes
Executive Director

cc: Estelle Richman, Secretary, DPW
Joan Erney, Deputy Secretary, OMHSAS
Scott R. Schalles, Regulatory Analyst, IRRC