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INDEPENDENT REGULATORY
REVIEW COMMISSION

Ann Steffanic
Board Administrator
Pennsylvania State Board of Nursing
PO Box 2649
Harrisburg, Pa. 17105-2649

RE: 16A-5124: CRNP General Revisions

To Whom It May Concern:

I would like to address the following changes that need consideration in the CRNP General Revisions.

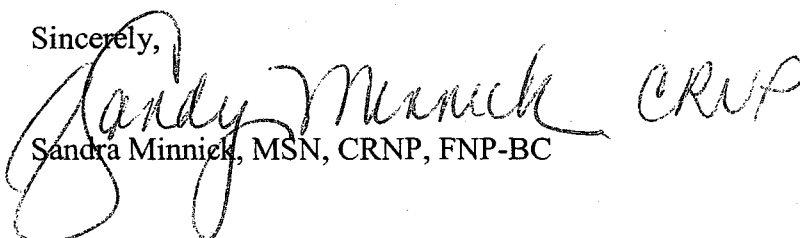
Removal of the 4:1 NP to physician ratio: While this regulation does not currently affect me, I do see that it limits the access to and continuity of healthcare for patients and communities served by nurse-managed centers, and federally qualified health clinics. These facilities are typically the ones serving the poorest of the poor and those people who are underinsured or uninsured. Removal of this restriction would allow more Nurse Practitioners to serve this underserved population.

Extending the NP's ability to prescribe Schedule II meds from a 72 hour to a 30 day prescription: this restriction of practice disrupts the continuity of care for those patients and family members who choose to see me for chronic pain management, behavioral and psychiatric/mental health care. With the limited schedule II prescribing in effect, there are increased trips to providers, pharmacies, and often emergency room visits. Nurse Practitioners frequently provide the care to these challenging types of patients, and unnecessary limitation of schedule II prescribing fragments this care.

Schedule III and IV prescribing: by approving the provision to allow NP's to prescribe Schedule III and IV medications for a period of up to 90 days, enable NP's to participate fully in patients' insurance pharmacy benefit plans, to save excessive copays and coordinate medication needs. This would save my collaborating physicians, our office staff, and clerical staff numerous hours spent on duplication of paperwork to currently meet the regulations.

Thank you for consideration of these revisions. I would like to see Pennsylvania serve as a role model state for efficient, effective, and safe patient care.

Sincerely,

 CRNP
Sandra Minnick, MSN, CRNP, FNP-BC