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2008 DEC 10 PM 1:47
INDEPENDENT REGULATORY
REVIEW COMMISSION

December 3, 2008

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


Thank you for this opportunity to present the views of the Pennsylvania State Nurses Association (PSNA) in regard to proposed Regulation 16A-5124 (Certified Registered Nurse Practitioners).

Allowing CRNPs to practice to the full extent of their education and clinical experience improves access to care, lower costs, improves quality of care, and encourages CRNPs to practice in Pennsylvania upon graduation. PSNA strongly encourages the Board to accept these regulations as written, particularly the removal of the 4:1 CRNP to physician collaborating ratio and the restrictions on prescribing Schedule II, III, and IV drugs. PSNA feels that the archaic system currently in place in Pennsylvania is overly restrictive and is barrier to CRNP practice and access to quality patient care.

CRNPs provide primary care in a variety of settings, oftentimes in the most underserved areas. By removing the 4:1 collaborating ratio, access to care would be improved in the underserved areas that rely on CRNPs for their primary health care services. Physicians and CRNPs in discussion together are best able to determine the safest collaborating agreement for their specific situation and patient population. This need not be regulated. Many facilities may employ additional CRNPs to meet the demand of the community; however, they are prohibited from doing so because they lack sufficient numbers of primary care physicians with which to collaborate. This lack of primary care physicians causes patients to seek more expensive treatment in an emergency room or seek no treatment at all.

Another barrier to effective patient care is the unnecessary restriction to the prescribing parameters in Schedule II-IV drugs. The proposed change in prescribing parameters for CRNPs regarding Schedule II drugs from 72 hours to 30 day dosage would lower costs to consumers by eliminating unnecessary trips to the pharmacy and removing added co-pays required for subsequent office visits. This change would also assist CRNP's to better manage their patients' health care needs especially as it relates to pain management. Permitting Schedule III and IV to be increased from 30 day dosage to 90 day dosage will allow consumers to better utilize insurance discounts for these categories of drugs.

I strongly urge you to consider approving these regulations as written. By passing the proposed regulatory changes, which are consistent with national trends, Pennsylvania would increase the number of CRNPs that would be remain in practice in the Commonwealth. More CRNPs practicing in our state will result in increased access, lower costs, and improved healthcare services within our communities. The Pennsylvania State Nurses Association believes that these regulations are consistent with the intent of Act 28 of 2007 and supports them as written.

Sincerely,

Betsy Snook, M.Ed., BSN, RN
Chief Executive Officer