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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

RE: 16A-5124 CRNP General Revisions

Dear Ms Steffanic:

I am a Certified Oncology Nurse Practitioner working as a Palliative Care Coordinator at a Cancer Center in Philadelphia. I am writing to support the proposed rulemaking package that will affect the regulations of nurse practitioners.

As a Nurse Practitioner working in palliative care, I do pain and symptom management of cancer patients on a daily basis. I cannot prescribe more than three days worth of narcotics for my patients; therefore my collaborating physician has to do the work. This is a barrier for appropriate pain management because our patients have to wait until my collaborating physician is available to write the prescriptions. Even if I write a prescription for narcotics (3-day supply), many patients have difficulty with transportation and they cannot come to the Cancer Center very often. They would have to come twice in a week to pick up a prescription written by me and 3 days later another prescription written by the doctor. If transportation is a problem, patients may choose to bear the pain and wait until the doctor writes the prescription. If I was able to write a prescription for a 30-day supply of narcotics, this problem would be solved and patients would have prompt and better pain management.

The other proposed rule that allows CRNPs to prescribe 90 days worth of schedule III and IV medications is also important. If we are allowed to write a three-month supply of these medications, patients will be able to save some money in co-pays. If we are not permitted to write these prescriptions, once again the patient would have to choose between a 30-day supply prescription written for his/her Nurse Practitioner or to wait for the physician to write for a three-month supply. Patients should not have to make these types of decisions.

I strongly believe that the proposed rule changes are critical to improve symptom management and the overall quality of life of our patients.

I urge you to approve the proposed rulemaking.

Sincerely,

Clara Granda-Cameron

Clara Granda-Cameron, MSN, CRNP, AOCN
Advanced Oncology Certified Nurse Practitioner
Joan Karnell Cancer Center at Pennsylvania Hospital