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**CANCER CARE CENTER
Sharon Regional Health System
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HEMATOLOGY/ONCOLOGY

December 4, 2008

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INDEPENDENT REGULATORY
RENEW COMMISSION

Ms. Ann Steffanic
Board Administrator, Pennsylvania Board of Nursing
PO Box 2649
Harrisburg, PA 17105-2649

RE: 16A-5124 CRNP General Revisions.

Dear. Ms. Steffanic:

I am writing regarding the proposed rule changes for CRNP regulations for nurse practitioners practicing in Pennsylvania. I am an advanced oncology certified nurse practitioner and practice in a hospital based oncology practice with three medical oncologists.

Due to chronic pain syndrome frequently associated with an underlying malignancy I am daily involved with the assessment of pain control for my patients and making new recommendations for improved pain management, which frequently involves prescribing new pain medicines or adjusting existing narcotic analgesic doses.

Current Pennsylvania CRNP regulations limit the prescribing of schedule II controlled substances to a 72 hour supply. If a physician is unavailable to write for a 30 day supply, my patient's are required to make additional return trips to the office for the remainder of their pain medications. This is a hardship for patients and their families, often weak and debilitated by their underlying disease and cancer treatments. It may also contribute to increased out of pocket expense with extra copays for additional monthly prescriptions. This may not sound significant until you factor in that 80% of my patients are elderly, medicare recipients, on fixed incomes, already stretched to the limit financially by the rising cost of food, fuel and other consumer goods, as well as the added financial burden of their illness.

The proposed changes to CRNP regulations allowing expanded schedule II prescribing to a 30 day supply would allow me to better meet the needs of my patients and improve access to the healthcare services they need. It would not only improve the quality of their lives, but may also resolve in cost savings for some.

STEFFANIC, ANN
Debra Evans, CRNP

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Debra Evans, CRNP

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I urge the Pennsylvania Board of Nursing to adopt the proposed changes in the CRNP regulations, allowing Pennsylvania nurse practitioners to practice more fully within their scope of practice and actively participate in meeting the healthcare needs of all Pennsylvanians.

With Regards,



Debra Evans, CRNP, AOC, NP

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