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December 5, 2008

Ann Steffanic
Board Administrator
Pennsylvania State Board of Nursing
P.O. Box 2649
Harrisburg, Pennsylvania 17105

To: Ann Steffanic and the State Board of Nursing,

Ref: 16A-5124: CRNP General Revisions

INDEPENDENT REGULATORY
REVIEW COMMISSION

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This letter is in regards to the proposed revisions promulgated by the Pennsylvania State Board of Nursing. As a family physician, I am writing in support of these revisions. I have a fairly busy practice of over 1500 patients and currently employ a nurse practitioner. I find that the current regulations hamper the care we offer our patients. They are often placed in a position of paying higher costs for medications and worse yet may suffer pain and suffering due to the limited time frame for schedule II narcotic medications.

I offer my support for the proposed changes in the following areas:

1. Allow thirty day prescriptions for schedule II controlled substances so that our patients are not dealing with increased pain due to the current limit of 72 hours.
2. Allow ninety days for schedule III-IV controlled substances to allow patients to benefit by the ninety day refill offered by some insurance companies.
3. Elimination of the 4:1 requirement of physician to CRNP ration does not directly affect our practice and I have no comment on this regulation.

Thank You,

Dennis Scully MD
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