

December 2, 2008

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

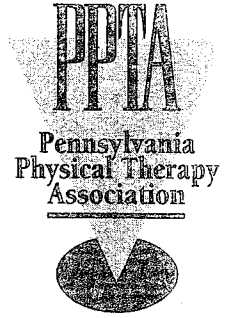
2729

RECEIVED

2008 DEC 10 PM 1:42

Re: Proposed Certified Registered Nurse Practitioner Regulations

INDEPENDENT REGULATORY  
REVIEW COMMISSION



Dear Ms. Steffanic:

I am President of the Pennsylvania Physical Therapy Association ("PPTA"). I am taking this opportunity to comment, on behalf of the PPTA, on the proposed regulations for certified registered nurse practitioners that were published in the Pennsylvania Bulletin at 38 Pa. Bulletin 6161, on November 8, 2008. While the PPTA is generally not opposed to the proposed regulations as written, the PPTA offers the following comments and recommendations:

Act 48 of 2007, effective September 18, 2007, amended the Professional Nursing Law (Act of May 22, 1951, as amended) by setting forth specific practices that a certified registered nurse practitioner ("CRNP") has the authority to do, subject to certain conditions. These practices include the authority to make physical therapy referrals. Act 48 of 2007 further provides that in order to have the authority to perform these certain tasks set out in subsection (c.1), it is necessary that the CRNP be acting within the scope of the CRNP's collaborative or written agreement with a physician and the CRNP's specialty certification.

The PPTA believes that it is essential that the proposed regulations indicate that the CRNP's scope of duties that can be performed be consistent with his or her training and education. Although this concept is set forth in the preamble to the proposed rule making, which discusses amending the regulations to allow CRNPs to practice within "the full extent of their education and ability", the PPTA believes that similar language should be included directly within the regulations themselves. The PPTA believes that there is potential confusion as to what CRNPs may *perform* within the scope of their duties and what CRNPs may *refer* within the scope of their duties.

The PPTA believes that clarifying language relative to training and education and the activities that a CRPN can perform could be included in the proposed 49 Pa. Code §21.282a, Medical Examination, Diagnosis and Treatment. This could be accomplished through an opening provision which provides "Consistent with a CRNP's training and education and particular clinical specialty area: . . ."

Thank you for the opportunity to provide a response by the PPTA to the proposed Certified Registered Nurse Practitioner Regulations. Should you have any questions regarding the PPTA's comments, please do not hesitate to contact me to discuss.

Sincerely,  
Pennsylvania Physical Therapy Association  
*Geraldine M. Grzybek*  
Geraldine M. Grzybek, PT, GCS President

4646 Smith Street  
Harrisburg, PA 17109.1525  
717.541.9169  
1.800.962.PPTA  
717.541.9182 FAX  
PAPTASSN@aol.com  
www.ppta.org

officers

Geraldine M. Grzybek, PT, GCS  
President

Ivan Mulligan, PT, DSc, SCS, ATC  
President Elect/Treasurer

Barbara R. Wagner, PT, DPT, MHA  
Vice President

Tom McNamee, PT  
Secretary

Kristin Von Nieda, PT, DPT, MEd  
Chief Delegate

