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INDEPENDENT REGULATORY  
REVIEW COMMISSION

November 28, 2008

Reference No.: 16A-5124 CRNP General Revisions  
Ann Steffanic  
Board Administrator  
Pennsylvania State Board of Nursing  
P.O. Box 2649  
Harrisburg, Pa 17105-2649

Dear Ms. Steffanic,

This letter is to support the update of our regulations in order to provide the care our patients require and to remove the barriers to our practice. I have practiced as a Nurse Practitioner since 1999 as a hospitalist with internal medicine.

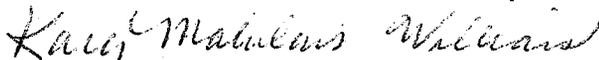
I have found the limit of 72 hours for schedule II narcotics to be a barrier to providing optimal pain control for our patients, particularly for our patients with chronic pain and for our patients in palliative and hospice care. Additionally, it is costly for our patients to fill a 72 hour prescription, when a 30 or 90 day prescription would be less costly. For example, under the current limits, I am only allowed to write a prescription for one Fentanyl patch. A fentanyl patch is a topical medication that is worn for 72 hours. As well, the fentanyl patches are sold in unit of four.

I support and recommend that the Stage Board of Nursing extend the limit of schedule II narcotics to a 30 day prescription and to extend the limit of schedule III and IV narcotics to a 90 day prescription.

Regarding the ratio of Nurse Practitioners to physicians, I support removing the 4:1 ratio. Nurse Practitioners practicing in clinics, nurse managed centers, and federally qualified health clinics are most affected and would benefit from the removal of the restrictive ratio.

Removing blocks to access to patient care by updating our regulations will serve to increase availability of health care in the Commonwealth of Pennsylvania.

Sincerely,



Karen Matulonis Williams, B.S.N., M.N., C.R.N.P.