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December 4, 2008

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

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear, State Board of Nursing Members:

Subject: 16A-5124: CRNP General Revisions

I am writing in support of the proposed changes in the Pennsylvania Certified Nurse Practitioner regulations. I am employed as a full time nurse practitioner at York Hospital Pain Relief Center. I am the only full time provider at this busy pain management center while two board certified pain management anesthesiologist rotate days at the pain center and their anesthesia responsibilities at the York Hospital and Apple Hill surgical center. The pain center provides care to persons experiencing semi acute pain and chronic painful conditions such herniated lumbar disc and/or cervical disc, acute and chronic post herpetic neuralgia, diabetic peripheral neuropathy and other chronic painful conditions. While at the center the physicians perform 80-90 % of the pain management procedures. I am responsible for the clients' medical management, especially those who are not candidates for interventions or have not obtained significant relief with various interventions. Not all of the patients experiencing chronic pain require opioids, but many of them do. At this time the current Nurse Practitioner regulations make it very difficult for me to provide clients with their needed medications. These regulations limit me to writing scheduled II controlled substance for up to 72 hours and scheduled III and IV controlled substance for up to 30 days. Most clients are coming to the pain center as a last resort in hopes of achieving some relief of pain that may extend a lifetime and require monthly prescriptions of opioids. With the current regulations I am required to obtain a prescription signed by the physician in order to provide adequate amounts of scheduled II, III and IV substances. This means constantly interrupting the physician during procedures and delaying the timely care for my client and the physician's client. Although both physicians trust my clinical judgment and assessment skills the current regulations requires their signatures on prescriptions I am writing. This essentially makes them responsible for the controlled substance prescriptions for clients they have never met or examined. I want to take full responsibility for the care and prescriptions my client's receive. Clients also become confused about who is providing there care when another providers name is on their prescriptions. Many nurse practitioners in family practice, adult care, oncology, surgical practices etc have to deal with the same circumstance when providing pain management for their clients. Pennsylvania Nurse Practitioners need the proposed regulations to be approved in order to provide efficient quality care to the many clients who depend on them for care. Please remove the unnecessary road blocks that make it difficult for them to practice and provide the quality care they are very capable of. Support the proposed regulations. Thank you,

*Linda M. Horner CRNP*  
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