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

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

**RE: No. 16A-5124 (CRNP general revisions)  
Proposed Rulemaking  
Pennsylvania State Board of Nursing**

December 5, 2008

Dear Ms. Steffanic:

I am writing in support of the Pennsylvania State Board of Nursing proposed revisions to Chapter 21, Subchapter C relating to Certified Registered Nurse Practitioners.

I am a geriatrician who has worked with nurse practitioners for the past 28 years. They have been an invaluable help to me and to my patients and their families in office, hospital and nursing home settings. The existing regulations in Pennsylvania prevent nurse practitioners from being utilized to the fullest extent of their education and training, and the proposed rulemaking would allow them to perform in a manner more consistent with their scope of practice.

CRNPs are required to complete advanced degrees in masters or post-masters programs with **at least 45 hours of course work specific to advanced pharmacology**. They are also required to pass a National certifying examination. After obtaining an initial CRNP license, **there is a requirement for at least 16 hours of continuing education in pharmacology every two years** in order to renew a CRNP license. The CRNP is also **required to maintain a DEA certification** in order to prescribe Schedule II, III and IV controlled substances.

In light of these education and training requirements, the proposed rulemaking regarding Schedule II controlled substances, prescribing for commonly used off-label indications, and issuing written as well as oral orders are extremely appropriate.

The proposed rulemaking also clarifies the definition of the prescriptive authority collaborative agreement and allows for additional details to be specified in an oral or written agreement between the CRNP and the collaborating physician. This clarification would accommodate the individualized nature of each collaborative arrangement.

I sincerely appreciate the thoughtful, practical and comprehensive changes in the proposed rulemaking for nurse practitioners in Pennsylvania.

Sincerely,  
  
Susan Denman MD CMD FACP