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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 the practitioner of Nurse Practitioners.

As a supporter of Nurse Practitioners, I have found the limit of 72 hour prescription for schedule II drugs to be a barrier to provide optimal pain control for patients. It is costly for the patients to fill a 72 hour prescription, when the copay for a 30 or 90 day prescription would be less costly.

I recommend the extend the limit of schedule II drugs to a 30 day prescription, and recommend for schedule III and IV, 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 with 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,

 29 Nov 2008

Thomas C. Williams Ph.D.