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of UPMC RECEIVED

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2008 DEC 10 PM 1:41 Division of Development-Behavioral Pediatrics

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

December 5, 2008

Ann Steffanic  
Board Administrator  
Pennsylvania State Board of Nursing  
PO Box 2649  
Harrisburg, PA 17105-2649  
Ref. # 16A-5124 CRNP General Revisions

Dear Ms. Steffanic:

I am writing in support of 16A-5124 CRNP General Revisions. I am a Professor of Pediatrics and Psychiatry and work as a Developmental-Behavioral pediatrician at the Child Development Unit and as the Director of the Down Syndrome Center at Children's Hospital of Pittsburgh of UPMC.

I supervise two nurse practitioners (CRNPs) in my practice. These CRNPs assess, diagnose and treat children and adolescents who have Attention Deficit Hyperactivity Disorder (ADHD) and other mental health issues that are treated with Schedule II drugs such as methylphenidate and dextroamphetamine. One of the major issues for these CRNPs is the inability to prescribe Schedule II drugs for more than 72 hours. The proposed regulations would increase this time frame to 30 days. If this is approved, it will enhance the quality of care for the patients we work with because I will not have to sign Schedule II prescriptions and take time away from my own patients or from the patients seen by the CRNPs to sign these prescriptions. I am confident that the CRNPs will consult with me if they have questions or concerns when prescribing Schedule II medications. They are capable of prescribing these medications independently.

I am also in support for the removal of the 4:1 physician to CRNP ratio. Practitioners who function in federally qualified health professional shortage areas, rural health centers, and primary care offices are affected by this antiquated regulation. Another consideration is the fact that the prescriptive collaborative agreement requires a back up physician. This proves to be more challenging and may impede/inhibit patient care. As CRNP's do not require supervision or physician presence to practice, it does not make good sense to limit access to care.

I strongly encourage you to support passage of support of the proposed Pennsylvania State Board of Nursing Rules and Regulations. If you have any questions or need any clarification, please feel free to contact me at 412-692-5560.

Very truly yours

William I Cohen MD  
Developmental Behavioral Pediatrician  
Down Syndrome Center of Western PA  
Professor of Pediatrics and Psychiatry  
University of Pittsburgh School of Medicine