



School of Nursing
Claire M. Fagin Hall
420 Guardian Drive
Philadelphia, PA 19104-6096

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

December 4, 2008

Dear Ms. Steffanic,

On behalf of the University of Pennsylvania School of Nursing, I am writing to express our enthusiastic support of the proposed rule changes affecting the practice of nurse practitioners in the Commonwealth. I am an Associate Program Director and a practicing nurse practitioner and understand the present barriers in my own practice.

Our School is one of the top Schools of Nursing in the country offering, in the words of one of our program directors, "the most rigorous clinical decision-making education." Yet, our graduates are prevented from practicing at the highest levels of their ability by the current rules of the Commonwealth, leading those who can, to practice in neighboring states such as New Jersey and Delaware where they can use their education, clinical expertise, and clinical judgment capacity to the fullest.

Removing the 4:1 CRNP to physician ratio will enable many more of our graduates to practice in clinics that serve some of the neediest and most vulnerable patients. With the current economic downturn, this population can only be expected to grow at a time when the Commonwealth is already experiencing a nurse shortage. Continuing the restrictive regulations will put unnecessary pressure on the neediest Pennsylvanians.

The education of nurse practitioners includes 500 hours of clinical experience at some of the finest hospitals in the nation and extensive knowledge of pharmacology. But what's most important is the nurse practitioner learns exceptional decision-making skills and clinical judgment for assessment of patients' health care needs, for identifying and delivering care, and for mobilizing healthy environments. The education prepares them for evidence based decision-making.

It is time nurses were authorized to practice at their full capacity for the people of Pennsylvania. We emphatically encourage passage of these regulations.

Sincerely,

Deborah Cross, MPH, ANP-BC
Associate Program Director
Adult Health Nurse Practitioner Program
Gerontology Nurse Practitioner Program
University of Pennsylvania School of Nursing
418 Curie Blvd
Philadelphia, PA 19104-6020

RECEIVED

2008 DEC 11 PM 2:25

INDEPENDENT REGULATORY
REVIEW COMMISSION

2729