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INDEPENDENT REGULATORY
REVIEW COMMISSION

December 7, 2008

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

RE: 16A-5124 CRNP GENERAL REVISIONS

Dear Ms. Steffanic:

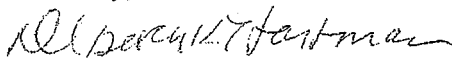
I am writing in support of the proposed revisions to the CRNP regulations. I am a CRNP with certifications in Adult Psychiatric Nursing and Addiction/Recovery Nursing. I work for Community Services Group in Lancaster, PA, and have a large and diverse caseload of individuals with mental health, mental retardation, and addiction disorders.

In the posted objections to the revisions, mostly by medicine, I see rather vague statements that CRNPs are inadequately educated and prepared to provide longer prescriptions for controlled substances. There are understandable concerns that, in a time of overutilization, diversion, and non-medical use of controlled substances, increasing the prescriber base requires careful thought. However, there are several states where NPs do not have restrictions, and there is no evidence that they engage in incautious prescribing.

The National Ambulatory Medical Care Survey database was examined for prescriptions written by primary care providers (physicians, nurse practitioners, physician assistants). A sample of 88,346 visits showed that NPs were least likely to write for a controlled substance behind physicians and PAs. This was a national survey, including states where NPs do not have restrictions on time and number of doses. (J Am Acad Nurse Pract. 2006 Jun;18(6):291-6). Another (national) study from my own specialty showed that psychiatrists were twice as likely as psychiatric APRNs to write prescriptions for benzodiazepines. (Arch Psychiatr Nurs. 2003 Jun;17(3):101-7)

As a professional who witnesses daily the deleterious effects of non-medical use of controlled drugs, I am very concerned about overprescription. However, with respect, NPs did not open that Pandora's box. The current restrictions interfere with adequate patient care, often in underserved areas, and I am asking for adoption of the revisions.

Sincerely,



Deborah K. Hartman, CRNP