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Devon, PA 19333

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INDEPENDENT REGULATORY
REVIEW COMMISSION

December 2, 2008

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

Dear Ms. Ann Steffanic,


Subject: Comments regarding 16A-5124

As a Family Medicine Physician, I realize the importance of collaboration and improved access to care for Pennsylvanian patients. I believe that removing restrictions of practice for Nurse Practitioners in Pennsylvania will improve overall quality, access and affordability of care. I see the impact CRNPs have on patients. I write in support of the proposed changes to 49 PA code Ch. 21: CRNP General Revisions.

I support the removal of the 4:1 CRNP to Physician ratio. This ratio makes it more difficult for flexible collaboration across large health care teams and impacts the ability of physicians and nurse practitioners to practice as professionals. A ratio often limits patient's access to comprehensive and collaborative care.

I also would urge you to allow 30 day prescriptions for Schedule II controlled substances. The current 72 hours rule makes it difficult to ensure seamless pain management for patients because of the constant concern about logistics. It requires a physician to interrupt their care delivery in order to write an order on another patient that a professional nurse practitioner is or has been already delivering care. It is inefficient, wasting time and undermining talent. There are also liability issues for Physicians when they are writing orders on patients that they have not been caring for directly. Patients deserve a less disruptive interaction with their care provider.

Sincerely,



Gregory T. Narzikul M.D.