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FAMILY & COMMUNITY HEALTH DIVISION
UNIVERSITY of PENNSYLVANIA
SCHOOL of NURSING

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INDEPENDENT REGULATORY
REVIEW COMMISSION

2729

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

December 8, 2008

Dear Ms. Steffanic:

As Director of the Advanced Practice Programs in Psychiatric-Mental Health Nursing at the University of Pennsylvania School of Nursing, I am writing to express our faculty's enthusiastic support of the proposed rule changes affecting the practice of nurse practitioners in the Commonwealth.

Our School only recently received State Board approval for its Psychiatric-Mental Health Nurse Practitioner program. Already we are seeing increases in applications and enrollments, as nurses interested in this field recognize the advantages offered by this particular role in the Commonwealth. To date, our graduates have all passed the ANCC certification examination and are practicing in a variety of settings. However, our graduates are prevented from practicing at the highest levels of their ability by the current rules of the Commonwealth, leading many of these graduates 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 mental health clinics and other settings 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.

Further, we support fully the change to allow 30 day prescriptions for Schedule II controlled substances and 90 day prescriptions for Schedule II and IV drugs. The education of nurse practitioners in PMH includes more than 500 hours of clinical experience at some of the finest clinical settings providing mental health care to the most vulnerable populations. Our students learn not only advanced pharmacology but also particular applications in a psychopharmacology course. Decision making and clinical judgment are integral to didactic courses which are case based as well as in the extensive clinical courses in which students are precepted by seasoned practitioners. 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.

Thank you for this opportunity to share our support.

Sincerely,

Lois K. Evans, PhD, RN, FAAN
vanAmeringen Professor in Nursing Excellence
Director, PMH Advanced Practice Program

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