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INDEPENDENT REGULATORY REVIEW COMMISSION

December 5, 2008

To the State Board of Nursing,

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As the CEO of Planned Parenthood of Central Pennsylvania (PPCP), I want to formally express to you my opposition to the regulation that states 'a physician can only collaborate with 4 CRNP's at any given time. This rule does limit patient choice, block access to medical care and it would also decrease the total availability of health care in the Commonwealth.

PPCP provides quality health care to women and families in Adams, Franklin, Fulton and York counties. We provided over 10,000 women and men with services in 2007. Those services included cancer screening and referral, testing and treatment of sexually transmitted infections including HIV, annual examinations and referrals for a variety of health problems, screening for hypertension, pregnancy testing and options counseling, and provision of contraception.

Planned Parenthood health centers operate under strict Standards and Guidelines that have been established nationally not only by Planned Parenthood physicians but also by a National Medical Committee composed of nationally acclaimed physicians. The CRNPs are periodically directly observed as are their charts by a physician.

The intentions of Governor Ed Rendell with the passing of Act 48 in 2007 are counterproductive to the outcome of this rule. With fewer and fewer young physicians remaining in Pennsylvania, we are rapidly approaching a shortage of quality health care providers. The broad range of quality care that NPs provide to patients help to fill in the gaps left in our health care system in PA.

In order to offer the total medical care that Governor Rendell intended in the passing of Act 48, the CRNPs need to have Schedule II prescribing extended from 72 hours prescription to a 30 day prescription along with establishing the provision to allow CRNPs the ability to prescribe schedule II and IV medications from a period of 30 days up to 90 days. This will allow CRNPs the ability to fully participate in the patients' insurance pharmacy benefit plan, which saves consumers excessive co-payments and helps to coordinate their medication needs. By passing this prescription portion, the patient also benefits by reducing the number of times she has to pay for drug co-payments along with creating a reduction of trips to the pharmacy which could alter the timing of medication care.

With the country in the midst of a large health care crisis, the full utilization of medically qualified CRNPs helps medical providers provide best quality reproductive health care to our communities and also ensure medical availability to our patients.

Sincerely.

Suellen Craig

CEO. Planned Parenthood of Central PA