

2729
December 8, 2008

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

RECEIVED

2008 DEC 11 PM 2:21

INDEPENDENT REGULATORY
REVIEW COMMISSION

Re: Regulations 16A-5124 (IRRC # 2729)

Dear Ms. Steffanic,

I would like to take the opportunity to comment on the proposed regulations pertaining to Certified Registered Nurse Practitioners (CRNPs). I am in support of all of the proposed changes, with the exception of requirement to have the collaborating physician's name listed on her prescription pad. I have had to pleasure of being treated by a CRNP for several years I have been a resident of Pennsylvania. Dr. Suzanne Langner, PhD, CRNP, FAAN has provided excellent, comprehensive care to myself and my family. Dr. Langner has offered caring, supportive advice and treatment to me in times of health and illness, and I am confident that if I were to ever require the use of schedule II medications, I would want to continue to have her fully manage my healthcare needs. I have complete confidence that she would continue to provide comprehensive care for her patients and their needs with the proposed changes enacted.

Nurse practitioners have been providing care to communities for over 40 years, and studies support that the outcomes related to care received by their profession is equal to, and in some cases better, than that of their physician colleagues. As a resident of this state, I feel strongly that I have a choice of who I see for my healthcare needs. If the current rulemaking were to stand, it would impose limitations on the care I could receive from my CRNP. Given that the nurse practitioners who practice and are licensed in New Jersey are capable of prescribing schedule II medications for 30-days, it seems to only make sense that the same be true in our state. I also support the extension of prescriptions for schedule IIIs and IVs to a 90-day supply.

In terms of the collaborating physician's name being on the prescription, I am opposed to this due to the personal experience of having a study ordered by my CRNP and the results being entered under the collaborating physician's name. There was a delay in getting the study sent to her attention. Fortunately, the findings were normal, but it could have had very different outcomes. The added requirement of having the collaborating physician's name on the prescription pad is confusing and has potential to contribute to a delay in care. The collaborating physician did not exam me, was not consulted in the decision to order the study, and had no knowledge that I was in the office that day to receive care from Dr. Langner. Given her credentials, her active license to make medical diagnosis and order studies, I think she should have the authority to carry a prescription pad that bears only her name, if she so chooses.

I appreciate the opportunity to share my concerns regarding this proposed rulemaking. I have mailed a hard copy to your attention, as well as a fax to the general SBON email address.

Yours truly,

Sue Schrand
Philadelphia, Pa

Cc: Independent Regulatory Review Commission
IRRC@irrc.state.pa.us

2729

Steffanic, Ann

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From: IRRC [IRRC@IRRC.STATE.PA.US]
Sent: Monday, December 08, 2008 4:25 PM
To: Steffanic, Ann
Subject: FW: CRNP 16A-5124 / IRRC #2729

2008 DEC 11 PM 2: 21

INDEPENDENT REGULATORY
REVIEW COMMISSION

Comment received from IRRC.

From: Sue Schrand [mailto:sue.schrand@verizon.net]
Sent: Monday, December 08, 2008 4:18 PM
To: ST-NURSE@state.pa.us; IRRC
Subject: CRNP 16A-5124 / IRRC #2729

To Whom It May Concern:

Attached please find my comments regarding the proposed CRNP regulations. I have mailed a hard copy of the comments, but to be safe, thought I should submit comments via email/fax as well.

Thanks,

Sue Schrand