

GRAHAM NEUROLOGICAL ASSOCIATES

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

Dear Ms. Steffanic:

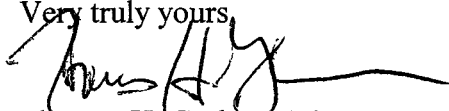
My practice, Graham Neurological Associates, employs a certified registered nurse practitioner (CRNP) and it has come to my attention that the rules and regulations guiding the practice of CRNP's in the Commonwealth are being considered for change. The Pennsylvania Medical Society has, likewise, informed me of the proposed regulation changes, and I am aware of their opposition to some of the regulation changes.

As a physician, I would particularly like to express my support for the proposed regulation changes on Schedule II, III, and IV prescribing. I am aware of the proposed regulation changes and will not reiterate them for the purpose of this letter, but I do support the practice of permitting my CRNP to extend prescribing Schedule II medications for 30 days from the current 72 hour restriction as well as the provision to allow up to 90 day prescribing for Schedule III and IV drugs.

In this particular practice, the removal of the 4:1 NP to physician ratio is perhaps less critical as I am a specialist. I understand the concern that primary practitioners and internists might have for extending the ratio beyond 4:1, but it is particularly true that in health clinics and other centers managed principally by nurse practitioners, health care can be extended in a more cost effective fashion to those who are not otherwise able to obtain health care with the removal or extension of the ratio to a higher ratio of NP to physicians. In short, I would also support the removal of the 4:1 NP physician ratio.

Thank you for your efforts in this matter. Specifically, I am referencing the general revisions numbered #16A-5124.

Very truly yours,



Thomas H. Graham, M.D.
THG/kl