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December 8, 2008

Fairmount

Louis R. Petrone MD  
Corina Graziani MD

2729

Thomas Jefferson  
University Hospitals

Thomas Jefferson  
University Hospital

Methodist Hospital  
Division

Jefferson Hospital for  
Neuroscience

Ford Road Campus

Methodist Hospital  
Nursing Center

Ann Steffanic

Board Administrator

Pennsylvania State Board of Nursing

P.O. Box 2649

Harrisburg, Pa 17105-2649

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 the former Coordinator of the Family and Adult Nurse Practitioner programs at Thomas Jefferson University from 2000-2005, and continue in joint practice at Jefferson Medical Care since 1997. I am in support of all of the proposed changes, with the exception of requirement to have my collaborating physician's name listed on my prescription pad. I have been certified and have practiced as a nurse practitioner since 1978, and have taught graduate students in family and adult health in both the academic and clinical settings for 13 years.

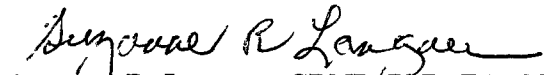
I believe that I adhere to the principles of exemplary nursing care laid out by my mentors Claire Fagin, RN, PhD, FAAN, and especially Ingeborg Mauksch, RN, PhD, FAAN who was my project director for my Robert Wood Johnson Fellowship in Primary Care. I provide comprehensive care to my patients during health and illness. I continue to maintain my knowledge of pharmacology and feel confident that patients should not be limited by the care they receive by an CRNP, including the prescription of schedule II medications. Our nursing colleagues in New Jersey are now able to prescribe schedule II medications for 30 days. It is my hope that Pennsylvania will not be far behind our sister state.

With regard to having my collaborating physician's name on the prescription pad, studies ordered by me are entered under the physician's name. There are times when the results are delayed in being sent to me. Although my physician partner and I make every effort to share results in a timely fashion, it is of concern that results of the studies ordered by me can be delayed because of the ruling that they must go through the physician first. Pennsylvania state law, my experience, board certification and my current license enables me to make a medical and nursing diagnosis and to order diagnostic studies. It would, therefore, facilitate and improve patient care to have the authority to carry a prescription pad that bears only my name.

Since the introduction of nurse practitioners in 1965, there is ample research that this group of advanced practice nurses provides primary care to patients that is equal to, and in some cases better, than that of their physician colleagues. As a resident of this state, I feel strongly that patients should be able to make the choice of who to see for their healthcare needs. If the current rulemaking were to stand, it would impose limitations on the care patients would receive from CRNPs. .

Thank you for your consideration in these matters.

Sincerely,

A handwritten signature in cursive script that reads "Suzanne R. Langner".

Suzanne R. Langner, CRNP, PhD, FAAN  
[Slangner@comcast.net](mailto:Slangner@comcast.net)