

WEST PENN ALLEGHENY HEALTH SYSTEM

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December 4, 2008

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

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RE: 16A-5124 CRNP General Revisions

Dear Ms Steffanic:

I am writing to strongly encourage the proposed change in the prescribing of schedule II medications The current regulation of prescribing for a 72-hour period causes undo hardship on patients and families and reinforces the stigma associated with opioids. I am a nurse practitioner who works in palliative care and hospice. With a growing outpatient population that comes into our practice for pain and symptom control, it does not make sense to patients that I can write a script for morphine but it is time limited to 72 hours. There is no point in writing the script at all. The message it sends is that I am not trained to prescribe these medications and that is simply not true. The very nature of my work in palliative care and hospice demands that I be especially skilled in prescribing and monitoring patients on opioids. I anticipate doing home hospice visits in the future but this regulation currently hinders my ability to provide adequate care in the home, especially in rural settings so I am reluctant to start this most needed service. Changing this regulation not only would improve access to much needed medications, it would also improve oversight in that the same person assessing the problem is the one also doing the prescribing

Thank you for your attention to this urgent matter

Sincerely,

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Susan Jessell, MSN, CRNP, ACHPN