

National Association of Pediatric Nurse Practitioners

20 Brace Road, #200, Cherry Hill, NJ 08034-2634

856/857-9700 (Voice)

856/857-1600 (Fax)

856/307-1812 (Home)

napnapbob@napnap.org



October 4, 2002

Timothy J. Muris
Chairman
Federal Trade Commission
600 Pennsylvania Avenue N.W.
Washington, D.C. 20580

Dear Mr. Muris:

On behalf of the National Association of Pediatric Nurse Practitioners (NAPNAP), I am writing to express our appreciation for your upcoming Public Workshop on Possible Anticompetitive Efforts to Restrict Competition on the Internet. The Federal Trade Commission obviously recognizes that certain state regulations and private business practices impede internet competitors in various fields, including health care, pharmaceuticals and telemedicine.

NAPNAP, an organization representing over 6,700 Pediatric Nurse Practitioners nationally, is particularly interested in those regulations that prevent consumers from accessing prescription medications from mail order pharmacies. Unfortunately, not all internet mail order pharmacies accept prescriptions that are written by nurse practitioners (NPs), despite the fact that NPs are practicing within their scope of practice, and in accordance with state law/regulations that allow them to prescribe. At present, all fifty states grant some level of prescriptive authority to NPs.

Current regulations are particularly burdensome to families whose children require medications to manage chronic health care conditions such as heart failure, asthma and epilepsy, where failure to maintain a medication regimen can have life threatening consequences for children. The result is a frustration to both families and legitimate providers and an unnecessary lag time in the delivery of medications for patients, or a greater expense to families who choose to have their prescriptions filled at local pharmacies. In addition, a number of NPs provide care in rural areas where physicians and other providers are not always available. Therefore, telemedicine is essential to the delivery of high quality health care in those areas.

NAPNAP is pleased to see the inclusion of Harriet Hellman, Chair of the Pharmaceutical Issues Task Force with the American College of Nurse Practitioners (ACNP), on your Telemedicine and Online Pharmaceutical Sales panel, and Bob Waters with the Center for Telemedicine Law who is also participating on your panel to address these concerns.

We appreciate FTC's on-going efforts to protect consumers, and we respectfully request that your organization help to remove barriers to NPs and consumers that impede the health care practice. We look forward to hearing the outcome of the workshop.

Thank you for your attention to this matter.

Sincerely,

Mary Margaret Gottesman, PhD, RN, CPNP
President

