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INDEPENDENT REGULATORY
REVIEW COMMISSION

MARY E. BOWEN, R. N., CRNP, Chairperson
Ann Steffanic, Board Administrator,
State Board of Nursing,
P. O. Box 2649, Harrisburg, PA 17105-2649
Reference No. 16A-5128 (CRNP CE course approval fee)

Dear Ms. Bowen,

I am opposed to the new proposal of setting a \$100 fee for approval of CEU courses that the Board of Nursing has not "pre-approved" for CRNP's for 2 reasons. As a CRNP and a CNM I take CEU courses that are nationally accredited and may not fit into the "pre-approved" accrediting associations that the Board of Nursing has narrowly limited. Many CRNP's must pay for relevant continuing education courses themselves and salaries are not as high as physicians to afford another \$100 for this approval. We also need to be thoughtful of CRNP's that are not working full-time or have limited incomes. The Board of Nursing also should consider all Advance Practice Nurses and not limit our educational choices.

Region 2 Chapter 4

This rulemaking sets a precedent for other Advanced Practice Nurses.

Instead of adding an additional financial burden to CRNP's I would suggest that the Board of Nursing:

- 1) Form a committee of CRNP educators who volunteer to review courses submitted by CRNP's, which are not pre-approved to identify their educational merit. This would not add any additional cost to the Commonwealth or CRNP's.
- * 2) Add "Nationally Accredited" CEU programs to the list of pre-approved courses and widen the possibilities of courses that many CRNP's/APN's may choose.
- 3) Lower the fee to an affordable amount (\$25) which would cover the resources needed to review the course by a CRNP Board member.

This ruling will have an impact on many of our choices for life-long learning. As nurses, we should set the standard of being less-restrictive and more supportive of educational choices which continue to support all of our respective practices.

Sincerely,

Vivian Lowenstein, CNM, CRNP, MSN
Chapter Chairperson, American College of Nurse-Midwives (ACNM),
Southeastern Region
President, Pennsylvania Association of Licensed Midwives (PALM)

