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PSNA

Pennsylvania State
Nurses Association

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INDEPENDENT REGULATORY
REVIEW COMMISSION

May 30, 2008

Mr. Arthur Coccodrilli, IRRC Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Chairman Coccodrilli;

Thank you for the opportunity to present the views of the Pennsylvania State Nurses Association (PSNA) on the Continuing Education for Professional Nurses, Regulation #16A-5130 (#2608). PSNA has three recommendations to present.

- 1. In the Regulatory Analysis Form for Continuing Education for Professional Nurses # 17, we recommend that the words "in-service training" be deleted.**

According to our accrediting body, The American Nurses Credentialing Center's Commission on Accreditation (ANCC-COA), "in-service training" is *not* continuing nursing education. It is important that the thirty (30) hours of continuing nursing education *advances* a nurse's knowledge base.

We would recommend the following changes:

...Because the Commonwealth has pre-approved regulated facilities as CE providers, there are many opportunities for participation in continuing nursing education activities. This will greatly reduce the cost of compliance.

OR...

...The Commonwealth has many approved providers of continuing nursing education through the Pennsylvania State Nurses Association, an accredited approver by the American Nurses Credentialing Center's Commission on Accreditation. Therefore, there are many opportunities for participation in CE activities which will greatly reduce the cost of compliance.

2. It is important that there is consistency in the number of minutes that constitute one contact hour.

The number of minutes that constitute one credit hour is inconsistent with the actions of many accrediting bodies who have worked together to establish a standard 60 minute clock hour as the equivalent of one contact hour. Not only is the 60 minute hour much easier to compute but many of the hospitals in the state of Pennsylvania are approved providers through the Pennsylvania State Nurses Association's accredited Approver Unit which uses the standard 60 minute contact hour.

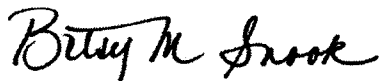
3. PSNA wishes to continue to register our disagreement with the Board's decision to *not* allow education that addresses self improvement and the prevention of professional burnout. These topics, among others, are areas that directly influence the quality and safety of care given to patients on a daily basis. There is no closer link in the field of health care than that of the patient and their nurse.

In a study by Peter D. Hart Research Associates, (April 2001), the top reason nurses left patient care, besides retirement, was to seek less stressful and physically demanding work. Employee stress and burnout can lead to a myriad of stress related illnesses that result in significant organizational consequences. The consequences of these conditions directly contribute to higher absenteeism and decreased work performance. Stress reduces the individual nurse's ability to make sound decisions and to concentrate. The nurse also experiences increased apathy, decreased motivation, and anxiety, resulting in possible lethal results in patient care. The evidence suggests that among the greatest costs of high turnover is greater patient mortality (JCAHO, n.d.). Specifically, national estimates, based on government, industry and health groups, place the cost of stress at approximately \$250 to \$300 *billion annually* (Jones, Tanigawa, & Weisse, 2003, as cited in Medscape Today, para.2).

With that said, education and interventions that will prevent stress or educate nurses about coping skills may prevent burnout and ensure safe, quality patient care and significantly reduce the cost to hospitals.

Again, thank you for the opportunity to present the Pennsylvania State Nurses Association's views prior to the final passing of this regulation. PSNA supports the requirement of 30 hours of continuing education every two years as one method for professional nurses to provide continued competent, safe, quality care to the citizens of Pennsylvania.

Sincerely,



Betsy M. Snook, MEd, BSN
Chief Executive Officer
PA State Nurses Association

Cc: Teresa Lazo, Board Counsel
Ann Steffanic, Board

End Notes

1. Medscape Today. (2007) Consequences of Stress. Retrieved on May 30, 2008 from http://www.medscape.com/viewarticle/562717_3.
2. JCAHO, (nd). Health Care at the Crossroads: Strategies for Addressing the Evolving Nursing Crisis. P 9-10.