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May, 15 2007

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

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STATE BOARD
OF NURSING

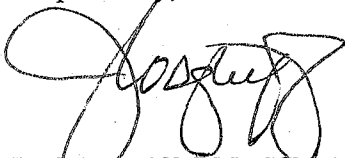
Dear Ms. Steffanic,

The intent of my letter is to address the continuing education credits that have been proposed for maintaining RN licensure in the state of Pennsylvania. My understanding is the credits are to total 30 hours of credit over a two year period. As you well know, school nurses already require 180 credit hours over five years from the Department of Education. The new proposal is unclear whether the school nurse credits will be accepted as those 30 hours of credit.

My proposal is to clearly define whether the 180 hours of credit will roll into those 30 hours and be used as credits for maintaining a registered nurse license. Typically, a school nurse would have to obtain 36 hours of credit over a two year period to qualify for adequate education credit for the Department of Education. These are referred to as Act 48 hours or requirements.

It would be of great benefit if these Act 48 hours could be forwarded to our continuing education requirements for our registered nurse license. Please review this proposal and clarify these two areas for the school nurses of Pennsylvania.

Respectfully,



Joni Cosgriff, RN, CSN, M.Ed.

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**COMMONWEALTH OF PENNSYLVANIA
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DEPARTMENT OF STATE
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May 22, 2007

To whom it may concern:

Thank you for your comments regarding the State Board of Nursing proposed rulemaking regarding continuing education for professional nurses (RNs). As you know, Act 58 of 2006, codified at 63 P.S. § 12.1, specifically provided as follows:

School nurses who as certified education specialists are required to obtain continuing professional education under section 1205.2 of the act of March 10, 1949 (P.L. 30, No. 14), known as the "Public School Code of 1949," and under this act shall be permitted to submit evidence of the completion of education courses approved for their certification by the school district.

The statutory language is clear that the Board must accept the continuing education courses that school nurses take for continued certification by the school district for licensure renewal. Therefore, there was no need for the Board to parrot the statutory language in its rulemaking.

I hope this has been responsive to your concern.

Very truly yours,

A handwritten signature in cursive script that reads "Teresa Lazo".

Teresa Lazo
Counsel, State Board of Nursing