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**Cocalico School District
Health Services**

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Tammy M. Frey
Cocalico High School
800 S. Fourth St.
Denver, PA 17517
May 16, 2007

Dear Ms. Sorensen,

I recently reviewed a copy of the proposed rulemaking document concerning Continuing Education for Professional Nurses and found there to be no provisions for Pennsylvania Department of Education (PDE) Certified School Nurses. In order to continue to maintain certification within the state of PA we are mandated to achieve 180 hours of continuing education every 5 years. If those nurses licensed and wishing to remain licensed in PA are additionally required to achieve 30 hours of nursing continuing education, in my opinion, this creates an unfair burden.

I would ask the State Board of Nursing to include some provision as an exception for currently certified school nurses in this document and the regulations. While I wholeheartedly concur that medical continuing education is important to the professional practice of nursing, perhaps there could be a provision that would decrease by half or more the number of medical CEU's required for certified nurses to 15 or 10 in addition to the 180 hours required by the PDE.

Please consider this request for exception on behalf of PA Certified School Nurses. I believe I speak for many of us when I say that we are not looking to avoid obtaining CEU's, only make the requirements from the two governing bodies under which we fall reasonable.

Respectfully,

Tammy M. Frey, RN, BSN, CSN, MSED
Coordinator of Health Services
Cocalico School District

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REVIEW COMMISSION

**COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL
DEPARTMENT OF STATE
OFFICE OF CHIEF COUNSEL
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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