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

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

STATE BOARD  
OF NURSING

May 16, 2007

In reference to **Regulation ID #16A-5130 (#2608)**

Dear Ms. Steffanic et al,

I am a School Nurse in the state of Pennsylvania (RN#06-446477). After reviewing the above referenced proposed legislation, I am writing to share a concern.

For Pennsylvania's School Nurses, there is already similar legislation in place through the Department of Education's ACT 48 regulations. We are required to attain 180 Continuing Education Units (or six college credits) every 5 years to stay certified as a School Nurse. We are also required to maintain current RN Licensure. This new proposed legislation through the Board of Nursing seems redundant for School Nurses.

I would strongly recommend either a change in the proposal's language, or an addition. Please include language in the proposal that states that ACT 48 credits earned by School Nurses are automatically eligible for the proposal's credits and vice-versa. Another option would be to exempt School Nurse's from the proposal's requirements. Either way, to not do anything in this regard is to be more than redundant. It would ignore the needs of thousands of School Nurses in the state and put them in a difficult predicament.

I look forward to seeing how the language in the current proposal is improved. Thank you for your consideration.

Sincerely,



Nathan Everhart RN, MSN, MA  
School Nurse  
James W. Parker Middle School  
11781 Edinboro Road  
Edinboro, PA 16412  
814-734-1151

cc:

Arthur Coccodrilli, Chairman  
Independent Regulatory Review Commission  
333 Market Street, 14th Floor, Harrisburg, PA 17101  
Fax: (717) 783-2664

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REVIEW COMMISSION

COMMONWEALTH OF PENNSYLVANIA  
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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