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May 16, 2007

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

STATE BOARD  
OF NURSING

Dear Ms. Steffanic,

I am writing to you regarding the proposed regulations for "Continuing Education for Professional Nurses," regulation 10 # 16A-5130 (#2608).

Currently, I am employed as a certified school nurse for Titusville Area School District. When Act 48 was passed, school nurses were included with teachers in requiring proof of 180 Act 48 hours every five years.

My concern about this regulation is the omission of any reference to continuing education for school nurses. We are 'Professional Nurses.' I feel there should be a provision in the regulation providing school nurses with credit for all Act 48 hours that apply to nursing or school nursing. Since these hours are already on record with the state of Pennsylvania, it would not be difficult to access these hours.

Sincerely,

Susan Gafner RN, BSN, CSN

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**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