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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

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,



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School Nurse  
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cc:

Arthur Coccodrilli, Chairman  
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