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Ann Stefanic
State Board of Nursing
PO Box 2649
Harrisburg, PA 17105-2649

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Stefanic,

I would like to address my thoughts and concerns with the proposed regulation changes regarding Continuing Education for Professional Nurses. In the paragraph with the heading of Background and Need for the Amendment, it states that "professional nurses were the only professional health care provider in this Commonwealth that were not required to complete mandatory continuing education for licensure renewal". Professional nurses are also the only professional health care provider who is not required to have the same entry level education (i.e. diploma, associate degree, BSN, etc.). It seems to me that the State Board should work on changing this discrepancy before we are all lumped into a profession that needs to pay yet more money to the Commonwealth for our Profession.

The cost of having Continuing Ed courses (that cost quite a bit to obtain in the first place) "accepted" to the board at \$75.00 a credit seems to be an exorbitant price. How are nurses who work part-time expected to pay \$2250 to the Commonwealth for the credits to be "accepted"? This rule may not "have an adverse fiscal impact on the Commonwealth or its political subdivisions" but it most certainly will have an adverse impact on the Commonwealth nurses. It seems to me that I have been reading a lot about the nursing shortage. This added financial burden will not help this problem. And I don't believe nurses, on the average, make as much annual salary as physicians, dentists, physical therapists, occupational therapists, or pharmacists in this state.

As a school nurse, I would also like to see language that addresses how Act 48 hours will be incorporated into this legislature. If I have to spend time and extra money to obtain Act 48 hours to keep my certification, it would be great if these courses could translate across both requirements.

Thank you,



Kathleen A. Williams, RN, BSN, Med, CSN
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Cc: Arthur Coccodrilli, IRRC Chairman