

May 16, 2007

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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

Kathleen A. Williams, RN, BSN, Med, CSN
17 Stoney Brook Blvd.
Greenville, PA 16125
Cc: Arthur Coccodrilli, IRRC Chairman



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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). It appears that there may be some misunderstanding among licensees regarding the proposed rulemaking. Therefore, I am writing to further explain the rulemaking.

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.

The Board's rulemaking was designed so that Pennsylvania's RNs would not incur any expense in meeting the new CE requirement. For this reason, the Board provided for an extensive list of "pre-approved" providers of continuing education. The list is in § 21.134 of the proposed regulatory language.¹ There will be no approval fee incurred by an RN who takes CE courses from a pre-approved provider. Obviously, because of the statutory language quoted above, there is also no approval fee for courses approved for certification by the school district.

¹ The pre-approved providers include all Board-approved professional nursing or CRNP education programs, all accredited professional nursing, CRNP, CRNA, CNS and nurse midwifery education programs, all programs sponsored by accredited hospitals and health care facilities, all programs sponsored by hospitals and health care facilities licensed by the Pennsylvania Department of Health, all programs sponsored by regionally-accredited institutions of higher education offering courses that comply with § 21.133, all national nursing, medical and osteopathic organizations and their state and regional affiliates, and all national pharmaceutical organizations and their state and regional affiliates.

I hope this has been responsive to your concerns.

Very truly yours,

A handwritten signature in cursive script that reads "Teresa Lazo".

Teresa Lazo
Counsel, State Board of Nursing