



Spring Grove Area Intermediate School

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May 17, 2007

2608

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

To: State Board of Nursing
RE: PA Bulletin #07-743; Regulation ID# 16A-5130

I would like to comment with regards to the proposed regulations for continuing education for registered nurses.

Section 21.29

I support the changes in regard to license renewal.

Section 21.133

As a practicing school nurse, I request that the board consider accepting Act 48 hours that have been approved by PDE as continuing education hours for license renewal. In my position as a school employee, it seems to me that school nurses would be held to a double standard in having to meet PDE standards as well as State Board of Nursing standards for continuing education.

Section 21.5

The cost of approximately \$2,250 every 2 yrs. to maintain my professional license is outlandish. When I submit continuing education hours to PDE for Act 48 approval, I am not asked to pay for their approval of those hours. These fees would be a hardship for me, as I do not receive the kind of pay that professional nurses in a hospital setting receive. As the shortage of nurses is reaching a critical level, how is this type of uncompensated expense to maintain a license going to attract new nurses? I will consider leaving the profession if this cost is an out-of-pocket expense for me.

Thank you for the opportunity to comment on these proposed regulations.

Sincerely,

Kathy L. Wingerd, RN, BS, CSN

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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