



# Spring Grove Area School District

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SPRING GROVE  
AREA SCHOOL DISTRICT

2608

May 17, 2007

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

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2007 MAY 23 AM 10:45

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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STATE BOARD  
OF NURSING  
2007 MAY 18 PM 1:27

To: State Board of Nursing

RE: PA Bulletin # 07-743; Regulation ID# 16A-5130

I would like to express the following comments with regards to the proposed regulations for continuing education for registered nurses.

Section 21.29

I support these changes with regards to license renewal. Thank you.

Section 21.133

With regards to the content of continuing education activities, I request that the board give additional consideration to nurses practicing outside of the traditional hospital setting. I am a certified school nurse, and courses that may traditionally be part of a curriculum for an educator or even a physical fitness instructor would be very applicable to the work I do on a daily basis. I would also ask that the board consider the implications for certified school nurses to be held to a double standard. We currently must meet the standards of the Pennsylvania Department of Education for Act 48. I would ask that the board consider accepting hours that have been approved by PDE for Act 48 as continuing education hours for license renewal.

Section 21.5

With regards to the proposed fees for approval of continuing education hours, I find these to be exorbitant. To have a nurse pay \$2250 every two years to renew a professional license is outlandish. I do not make that kind of salary working in a school district, and furthermore, when I submit hours to PDE for Act 48 approval, I am not asked to pay for the department's approval of those hours. I would find these fees to be a hardship if they were passed along to me as an individual nurse, and it would cause me to consider leaving the profession for other opportunities if the fee is kept at the proposed rate.

I appreciate the opportunity to comment on these proposed regulations.

Sincerely,

Lisa M Bahn, RN, M.Ed

*Shaping the Future... One Student at a Time!*



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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.<sup>1</sup> 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.

<sup>1</sup> 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