

Linda M. Uhernik

luhernik@comcast.net

481 Baker Road
Freedom, PA 15042

724-728-2896 (h)
724-312-2423 (c)

May 21, 2007

2608

Ann Steffanic, Board Administrator
State Board of Nursing
P. O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Steffanic,

This letter is in regards to Regulation ID #16A-5130 (#2608). I am a certified school nurse and certified registered nurse practitioner who not only practices in a public school and must obtain Act 48 credits to maintain my certification, but also acquire 30 continuing education credits every two years to renew my certification as a nurse practitioner.

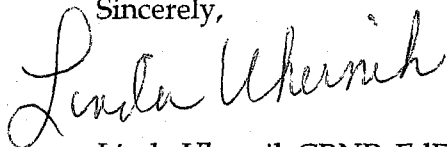
I am concerned that the Board of Nursing's proposed regulations for continuing education for professional nurses do not mention the Act 48 credits that are required for school nurses. In addition, there is no wording in the proposed regulation that addresses the thirty hours of continuing education required for certified registered nurse practitioners. However, according to "The Professional Nursing Law" Section 12 Continuing Nursing Education:

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; and,

Certified registered nurse practitioners shall fulfill the requirements for continuing education in accordance with sections 8.1 and 11, respectively.

In my opinion, if the Board is going to enact the proposed changes, the language must specifically state that school nurses and nurse practitioners are going to meet the new requirements as written in The Professional Nursing Law. I am sure you understand my concern and hope there will be clarification of these two issues when the regulations are finalized. Thank you for your consideration.

Sincerely,



Linda Uhernik CRNP, EdD

Cc: IRRC

House Professional Licensure Committee

Senate Consumer Protection and Professional Licensure Committee

RECEIVED
2007 JUN -4 AM 10:49
INDEPENDENT REGULATORS
PENNY COMMISSION