



VILLANOVA UNIVERSITY

COLLEGE OF NURSING  
ST. MARY HALL

2608

May 21, 2007

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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

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Dear Ms. Steffanic:

I am writing to comment on the State Board of Nursing's proposal to amend sections of the Professional Nursing Law to establish requirements for professional nurses to complete continuing education, as published in the Pennsylvania Bulletin of April 28, 2007. I support the need for professional nurses to complete continuing education in order to assure that nurses remain current in their knowledge of new developments in nursing and health care. I do, however, have several comments regarding the proposed rules for continuing education requirements for nurses, as follows:

- **21.133 (d)** – The proposed rules provide for “credit” for group or individual research, if approved by the Institutional Review Board. While I commend the Board of Nursing for recognizing the importance of nursing research and the contributions of professional nurses to research in nursing and health care, the proposed rule does not differentiate the different levels of contributions that individuals make to a research project, especially group research projects. It is not uncommon in group research projects for one or more group members to have primary responsibility for the project and others to have limited or less substantial responsibility for the research project. To avoid this disparity in involvement in a group research project, I would recommend that the Board of Nursing consider specifying that continuing education “credit” be given to the principle and/or co-investigator on a project.
- **21.134 (a) (3), (4), (6) and (7)**- The list of approved providers appears to be too broadly defined and without adequate safeguards to assure adherence to usual standards of accreditation or approval of continuing education programs. National accrediting organizations, such as the American Nurses Credentialing Center (ANCC), have established standards for the approval or accreditation of continuing education programs. These standards are widely accepted nationally

and serve to validate the quality and merit of continuing education programs. I would recommend that such standards be applied to all providers of continuing education for professional nurses in Pennsylvania.

- **21.5** – It is not clear who is required to pay the \$75 fee for approval of 1 hour of continuing education. This needs to be clarified in this section.

Thank you for the opportunity to comment on the proposed rules for continuing education for nurses.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lesley A. Perry".

Lesley A. Perry, PhD, RN  
Professor and Associate Dean