

Pennsylvania Association of School Nurses and Practitioners



PASNAP

May 22, 2007

2608

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 on behalf of the Pennsylvania Association of School Nurses and Practitioners (PASNAP) regarding Proposed Rulemaking on Continuing Education for Professional Nurses that was published in the PA Bulletin, Vol. 37, on April 28, 2007.

Since 2000, the over 2100 Certified School Nurses (CSN) in PA are currently required by statute to accumulate 180 hours of continuing education during a five year period to maintain their Educational Specialist Certificate through the Department of Education. CRNPs must already complete 30 hours of continuing education according to "The Professional Nursing Law" Section 8 amended June 29, 2002 (P.L. 651, No. 99). When Act 58 of 2006 was passed, it specifically noted:

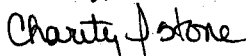
- 1. Certified registered nurse practitioners and dietetics-nutrition licensees shall fulfill the requirements for continuing education in accordance with sections 8.1 and 11 respectively.*
- 2. School nurses who as certified education specialists are required to obtain continuing professional education 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.*

Therefore, the belief was that these exceptions would be included in the proposed rules. However, after review of published materials, no mention of the above was found. We therefore respectfully request that the regulations be amended to include the aforementioned exceptions for CSNs and CRNPs. Without their inclusions, the continuing education load of both could become overwhelming.

In §21.131, subsection (c), we propose CSNs should be permitted to submit their continuing education hours using the electronic record from the Department of Education's web site "Professional Education Record Management System". This secure web site is an efficient and accurate record of all continuing education hours completed by CSNs. In §21.134, we believe that the addition of programs approved by the Department of Education as an Act 48 provider be included. In practice, the inclusion of this statement would solve the dilemma for CSNs since Act 48 hours must be directed toward the area of practice and meets the requirements of §21.133 (a) *that continuing education be relevant to professional nursing in a general or specialty area and enhance the knowledge and application of the physical, social, biological and behavioral sciences.*

I appreciate your time and further consideration of the proposals.

Sincerely,



Charity Istone MSN CRNP CSN
President

CC: Sen. Pat Vance
Sen. Jane Ori
Carol Karl, PSEA