



VILLANOVA UNIVERSITY

CONTINUING EDUCATION
COLLEGE OF NURSING
ST. MARY HALL

2608

May 23, 2007

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

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INDEPENDENT REGULATORY
PENSION COMMISSION

Dear Ms. Steffanic:

I would like to comment on the State Board of Nursing's proposed amendments to the professional Nursing Law to add continuing education requirements for relicensure. I am responding to the information that was published in the Pennsylvania Bulletin, April 28, 2007. I am glad to see that Pennsylvania is joining many other states in mandating 30 hours of continuing education each nursing relicensure period as a way to promote competence within the profession. My comments are as follows:

21.132 – Continuing Education hours. The proposed computation for continuing education credit is the 50 minute hour. In the field of professional development organizations now use the 60 minute contact hour. This is the standard for the American Nurses Credentialing Center (ANCC) as well as the International Association for Continuing Education and Training (IACET). Most other health-related accrediting bodies also use the 60 minute measure. The Board's rationale for the 50 minute hour is the transferability of academic credit to relicensure requirements. I believe that the majority of credits which will be applied for relicensure will come from continuing education activities, not academic credits. It would be less confusing for the registered nurses in Pennsylvania if the State Board followed the national standard.

21.133 – Continuing Education Content. The inclusion of credit for participation in group or individual research is commendable. Since many individuals can be involved in research in a variety of roles and degrees, I would suggest that the nurse who is able to claim credit for research activities should be limited to the primary investigator or the co-investigator.

21.134 – Continuing Education Sources. The list of providers of continuing nursing education that are currently acceptable for most state licensing boards, specialty organizations and certifying bodies emanates from the accreditation system of the American Nurses Credentialing Center (ANCC). This includes nationally accredited

colleges and universities, health care organizations and companies and the military, as well as providers who apply through the system supported by ANCC accredited approvers (state nurses associations for one). These activities meet the professional definition of continuing education. Accredited providers offer quality continuing education activities that meet national standards, requirements and criteria.

I have real concerns for accepting education provided by hospitals and health care facilities licensed by the Department of Health unless these organizations have also participated in an additional review process. Placing these organizations on a list of approved sources seems to exempt them from the traditional reviews in which quality continuing education providers all participate. Department of State licensed facilities have been reviewed for standards in the provision of patient care but not as an educational provider. More importantly, the approval of national pharmaceutical organizations and state and regional affiliates is inappropriate. These organizations are currently under scrutiny by many professional groups because of national concerns for conflicts of interest relating to education for health professionals. I would **strongly urge their removal** from the approved list of continuing education sources.

I have over 27 years of local, state, national and international continuing education experience as a provider, reviewer, and accreditation appraiser. I would be happy to serve the State Board in what ever capacity would be useful as the new regulations are developed and implemented.

Sincerely yours,



Lynore D. DeSilets, EdD, RN-BC
Assistant Dean and Director
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