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May 23, 2007

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

Re: Regulation ID #16A-5130 (#2608)

Dear Ms. Steffanic:

I am writing with my concerns for the Proposed Rulemaking of the State Board of Nursing re: continuing education for professional nurses.

I support the inclusion under §21.134 (Continuing Education Sources) of "programs sponsored by hospitals and health care facilities licensed by the Department of Health." It appears the Board is aware that we offer a great deal of ongoing education for the professional nurses employed by the facility and will this will enable most of the nurses to obtain their required CE hours at their site of employment.

However, I am concerned about the 120 day advanced submission required for requests for approval of continuing education activity as defined in §21.134 (14)(c). As a member of the Pennsylvania Association for County Affiliated Homes (PACAH), I know this deadline will be prohibitive in offering CE credits for professional nurses. Other Boards that accredit continuing education have actually decreased the lead time to 60 days. Please reconsider this roadblock for organizations to get approval for continuing education credits.

Please contact me if you have any questions.

Sincerely,

Margaret Harkobusic RN
Margaret Harkobusic, Director of Nursing

Cc: Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission

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REVIEW COMMISSION

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