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INDEPENDENT REGULATORY  
REVIEW COMMISSION

To whom it may concern,

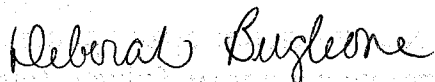
This letter is in response to the proposal for continuing education credits for Professional Nurses. This proposal must address Certified School Nurses who already need to maintain their education specialist certification through ACT 48 credits.

Since the year 2000, Pennsylvania's Certified School Nurses have demonstrated continued professional development in their specialty area through the Pennsylvania Department of Education Act 48 statutory requirements. Every five years, in order to maintain their educational specialist certification, they must submit 180 Act 48 hours. We would like to ensure that Certified School Nurses be exempt from the continuing education requirements for maintaining their nursing licenses, as long as they comply with the continuing education requirements necessary to maintain their education specialist certification as written in the Act of June 29, 2006.

We recommend that the State Board of Nursing amend the proposed regulation by adding a new section that addresses Certified School Nurses, exempting Certified School Nurses that maintain their education specialist certification from the continuing education requirements for license renewal.

We suggest that the list of approved providers include: the Pennsylvania Department of Education and the Pennsylvania Department of Health.

Sincerely,



Deborah Buglione RN, CSN, M ed.