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INDEPENDENT REGULATORY
REVIEW COMMISSION

Mr. Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market St., 14th floor
Harrisburg, PA 17101

Dear Mr. Coccodrilli;

I am writing in reference to the act of June 2006, which requires Pennsylvania Registered Nurses to obtain 30 Continuing Education Units every 2 years to renew their license.

I am a Certified School Nurse in Montgomery County, Pennsylvania. All Certified School Nurses in the state are already required to demonstrate continued professional development to maintain their education specialist certification as a school nurse. (Public School Code 1949; P.L. 30, No.14) The Pennsylvania Department of Education requires 180 Act 48 hours every 5 years.

I am requesting 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 continuing education requirements for license renewal. I would also like to request that the Pennsylvania Department of Education and the Pennsylvania Department of Health are listed as approved providers for continuing education.

I thank you for your attention to this matter.

Sincerely,



Susan J. Graham R.N.