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INDEPENDENT REGULATORY
REVIEW COMMISSION

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Ms. Steffanic:

I have reviewed the proposed rulemaking for Continuing Education for Professional Nurses. My comments are as follows:

Positive points:

*The number of continuing education hours per biennium is reasonable and workable, especially for nurses who work in hospitals and other healthcare facilities that operate 24/7/365.

* The allowance to use Distance learning continuing education for all 30 hours will give employers more flexibility with staffing in a field where shortages are an everyday experience.

Negative point:

- The 120 day submission requirement for approval of continuing education activities will be too challenging. The changes in presenters and their programs due to emergencies and job changes make the 120 days too far out. A more reasonable time frame would be 60-90days.

Thanks for the time and consideration to reviewing these comments on the rule.

Sincerely,

Nancy Pastorius, RN,BSN,NHA
Administrator/COO