



PACAH

PENNSYLVANIA ASSOCIATION OF COUNTY AFFILIATED HOMES

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May 29, 2007

RECEIVED
INDEPENDENT REGULATORY
REVIEW COMMISSION

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

2608

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

Dear Ms. Steffanic:

The Pennsylvania Association of County Affiliated Homes (PACAH) appreciates the opportunity to comment on your proposed regulations regarding continuing education for professional nurses. PACAH represents all county nursing facilities in the Commonwealth as well as a number of non-county nursing facilities. PACAH is an affiliate of the County Commissioners Association of Pennsylvania.

As a general statement PACAH supports the idea of continuing education requirements for professional nurses and believe these regulations should strike a balance between the need for continuing education and the realities of organizations struggling to maintain adequate and professional staff. We believe that for the most part these regulations accomplish this goal, but we do have a few specific comments which follow.

21.5 Fees - The proposed \$75 fee per hour of continuing education is excessive, and may prevent many potential small providers from offering continuing education. PACAH recommends a smaller per hour fee.

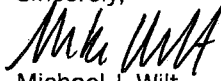
21.134 Continuing Education Sources - (a) - PACAH believes that the list of continuing education providers should be expanded to include those already approved providers of continuing education for nursing home administrators. This would include PACAH. As an alternative suggestion, PACAH would be willing to apply to become a continuing education provider for professional nurses on an ongoing basis, and this, once approved, would not have to comply with section (b) and be forced to apply on a case-by-case basis.

21.134 (c) - The requirement to submit material for approval 120 days prior to commencement of the activity is too long. Rapidly changing regulations and priorities make this time period unrealistic. PACAH recommends 60 days, which is the current requirement for the State Board of Examiners of Nursing Home Administrators.

21.134 (e) - The requirement to submit a separate application and fee whenever a change is made to any of the program content and speakers is prohibitive. Providers of continuing education cannot guarantee the appearance of all approved speakers due to extenuating circumstances and the proposed fee structure would make resubmission financially impractical. This also does not account for last-minute changes for both speakers and content due to circumstances the approved provider may not be able to control.

PACAH appreciates the opportunity to comment on these proposed regulations and is willing to address any of the above mentioned areas of concern in more detail.

Sincerely,



Michael J. Wilt
Executive Director

CC: Arthur Coccodrilli, Chairman, IIRC