



**PA STATE
Nurses
ASSOCIATION**

2578 Interstate Drive
Suite 101
Harrisburg, PA 17110
717-657-1222 | 1-888-707-7762 | Fax: 717-657-3796
Email: panurses@panurses.org | www.panurses.org

May 29, 2007

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

2608

INDEPENDENT REGULATORY
REVIEW COMMISSION

2007 MAY 29 PM 4:54

RECEIVED

Dear Ms. Steffanic:

Thank you very much for the opportunity to respond to the proposed regulations regarding Act 58. We have notified our members of the proposed regulations and have received many comments regarding the regulations published in the *PA Bulletin*.

The PA State Nurses Association (PSNA) and its members have reviewed the proposed regulations for Act 58, the Mandatory CE law. Below is a list of questions/comments related to the proposed regulations:

1. Section 21.133 Continuing Education Content – There is concern about the verbiage in the regulations relating to self-improvement courses that are not valid as nursing education. Our members have stated that they feel your definition of acceptable continuing nursing education is narrowly defined. Courses on stress management, interpersonal relationships, humor in nursing, etc., provide health promotion strategies for nurses that lead to better care of the citizens of Pennsylvania and retaining nurses in the profession. Self-improvement is a necessity to thriving in any environment, and all continuing education is self-improvement, whether that improvement is in skills, attitude, or dealing with difficult situations. By providing education in many areas the nurse deals with on a daily basis, you may be encouraging them to further their education. In today's healthcare environment, education related to changes in attitude is more important than it has ever been. Today's workforce is very diverse, both with multicultural and multigenerational issues that affect our everyday work environment. Education dealing with these issues is extremely important in our ever-changing work environment.
2. Section 21.5 – Fees – The proposed regulations state that there is a \$75 fee for the approval of one hour of continuing education. Does this mean each nurse will need to pay \$75 x 30 hours, equaling \$2250 every two years, to the State Board of Nursing? This is a large area of concern for our members and our customers who receive approval through PSNA. We are fielding many questions on this issue and nurses are saying they cannot afford this fee every two years, and that it



The Constant In Your Nursing Career
Constituent, American Nurses Association

will further affect the nursing shortage as nurses may choose to retire rather than pay \$2250 per year.

Furthermore, if each nurse does not have to pay \$75 for each hour of continuing education, are the regulations stating that the PA State Board of Nursing will now be approving all education for nurses given within the state of Pennsylvania? This is a concern for nurses, as well as for PSNA. We currently approve nursing education from many organizations both within and outside of PA, and this regulation would seriously affect our ability to be a provider and an approver of continuing education for nurses.

Related to this, will each organization have to become an approved provider through the State Board of Nursing at this fee for each hour of education we provide?

3. For retired nurses, will they need to maintain their 30 hours every two years if they retain an active license? Will they need to go to inactive or volunteer status to not be required to obtain 30 hours of continuing education every two years? In addition, what will the requirements be for a volunteer nurse?
4. Section 21.132 - There is concern about the 50-minute hour you reference in the proposed regulations. Many of the approval bodies have worked together to have a 60-minute hour. It would be very beneficial to have as much consistency as possible for nurses.
5. The nurses of Pennsylvania are expressing frustration at having to maintain their personal records for five years, rather than for the license renewal period of two years.
6. The nurses are requesting that the State Board of Nursing, or an approved designee, offer an online education tracking system so that an electronic record can be maintained for each nurse who holds a PA license.

Suggested changes that have been suggested by nurses in Pennsylvania include the following:

1. Broaden the definition of "acceptable continuing education content" to include health promotion for nurses as well as individuals and populations nurses work with.
2. Include, as appropriate, continuing education topics related to health maintenance, health restoration and health promotion. The value of these courses should be included in the application.

3. Issue clearer guidelines related to the approval fee structure and who will be required to pay those fees, the individual nurse or the providers of nursing education.
4. Further clarify if educational providers will need to seek approval through the State Board of Nursing. Please indicate whether approval would need to be obtained by agencies that are not listed as approved providers within the regulations or if all education, regardless of whether the organization is listed within the regulations, would need to seek approval through the State Board of Pennsylvania.
5. Offer suggestions or guidelines for retired and/or volunteer nurses.
6. We request further clarification regarding the need to maintain personal continuing education records for five years. We suggest the individual nurse maintain the records for a period of two years.
7. We request that the State Board of Nursing issue a timeline regarding when the comments received for the proposed Act 58 guidelines will be reviewed and when the date of approved regulations will be determined.

Thank you for the opportunity to respond to the proposed regulations. We hope that sharing the concerns of nurses within PA will help you in your efforts to finalize the regulations for Act 58. Please contact us with any questions you have regarding the comments listed above.

PSNA is a supporter of mandatory nursing education and Act 58. We feel that the education will benefit all registered nurses as well as the citizens of Pennsylvania. We hope that you will look to PSNA as an advocate of nursing education and nursing in Pennsylvania and we offer our assistance in moving this forward.

Sincerely,



Patti Gates Smith, MSN, RNC
Director of professional Development
PA State Nurses Association

cc: Arthur Coccidrilli, Chairman IRRC