

# 2608



## Pennsylvania Health Care Association

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**STUART H. SHAPIRO, M.D.**  
**President and CEO**

RECEIVED  
2007 MAY 30 AM 7:24  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

May 29, 2007

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

### REFERENCE: CONTINUING EDUCATION FOR PROFESSIONAL NURSES

Dear Ms. Steffanic:

The Pennsylvania Health Care Association (PHCA), an organization representing nearly 300 long term care and senior services providers that employ nearly 3,000 registered nurses who care for more than 60,000 elderly and disabled individuals across the commonwealth, thank you for the opportunity to comment on the proposed continuing education for professional nurses regulations as published in the Pennsylvania Bulletin on April 28, 2007.

PHCA first would like to congratulate the State Board of Nursing for the comprehensive, well thought out proposal that was presented. In particular, we appreciate the flexibility that our members' registered nurses will have in obtaining continuing education credits through distance learning as well as conventional methods. This is critical in nursing arenas that must offer care 24 hours a day, seven days a week.

Registered Nurses (RN's) employed in long term care settings, especially those employed as Directors of Nurses often are also licensed as Nursing Home Administrators (NHA's). These individuals are required to attain continuing education credits in order to renew their NHA. As a provider of NHA credits, we believe that often times there are a number of programs that we offer that would be appropriate to RN's; however, it is unclear from the proposed regulation whether or not PHCA would be an approved continuing education source as listed in §21.134 and we would ask that this be clarified. Specifically, we would ask that "medical" as found in subsection (a) (6) be defined broadly enough to include organizations such as ours which represent nursing homes.

In the event, that we would not be considered an approved continuing education source, we would ask that the timeframe to request approval on a case-by-case basis be shortened to 60 days similar to the State Board of Nursing Homes Examiners of NHA's as opposed to 120 days as stated under §21.134(c). The 120 day timeframe is too far in advance for presenters to submit program curriculum for approval if they are to present timely up to date information. This is particularly important for nurses employed in the long term care setting as federal and state law and regulations are frequently changing and it is critical that registered nurses are and continue to be well informed.

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Again, PHCA is appreciative of the fine effort put forth by the State Board in these proposed regulations. We would be pleased to answer any questions that you would have on our comments.

Sincerely,

A handwritten signature in cursive script that reads "Stuart Shapiro".

Stuart H. Shapiro, M.D.  
President and CEO

SHS/wlj