



BlueCross of Northeastern Pennsylvania

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INDEPENDENT REGULATORY
REVIEW COMMISSION

May 30, 2007

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

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Dear Ms. Steffanic:

On behalf of Blue Cross of Northeastern Pennsylvania (BCNEPA), I would like to express some concerns we have regarding the proposed regulations dealing with continuing education for professional nurses as published in the *Pennsylvania Bulletin* on April 28, 2007. We at BCNEPA support the intent of the regulations pursuant to Act 58 of 2006. We fully recognize the need for nursing continuing education and have strived to provide onsite opportunities for the nurses we employ; however, there are certain sections of the proposed regulations that may result in significant increase in the burden placed upon professional nurses in attempt to ensure they maintain the necessary education and skill level to competently perform their job duties.

The major area of concern for BCNEPA is the per credit hour cost of continuing education as proposed in the regulations. At seventy-five dollars (\$75) per credit, we believe the cost per credit will be unsustainable for a large portion of the professional nurse population. The regulation does not provide any explanation for the determination of this fee structure and assigning an arbitrarily high per credit hour cost to continuing education for nurses may accentuate the nurse shortage that Pennsylvania and our region in particular already faces. In order to help alleviate some of the financial and time burdens that will be faced by professional nurses attempting compliance with the law, we suggest that the Board consider allowing a nurse to apply continuing education credit hours obtained in other jurisdictions, if approved by that jurisdiction's board of nursing or medicine, towards the credit hours necessary to maintain a Pennsylvania license. Allowing this will mean that nurses will not be unduly burdened by having to meet the continuing education requirements of multiple jurisdictions, however, it will ensure that all licensed nurses are maintaining the necessary education and skills to perform their duties.

We respectfully ask that the Board consider these concerns in developing the final regulations pertaining to the continuing education of professional nurses. We appreciate this opportunity to comment on the proposed regulation.

Sincerely,

Leo M. Hartz, M.D., MHA
Vice President, Clinical Advocacy & Chief Medical Officer

