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INDEPENDENT REGULATORY
REVIEW COMMISSION

#2608

Renee Smith, RN, BSN, CPAN
Clinical Nurse Educator
Geisinger Medical Center
100 North Academy Avenue
Danville, PA. 17822
(570) 214-9641

May 21, 2007

Dear Ms. Steffanic,

As clinical nurse educators we are writing to support the Board of Nursing in its amendments to The Professional Nursing Law related to mandatory continuing education requirements. As professionals in the forefront of the healthcare arena, nurses need to stay abreast of the most current research and trends in nursing and healthcare. The Board's requirement for 30 contact hours during each two-year renewal period is in accordance with the requirements of other states that require continuing education for license renewal.

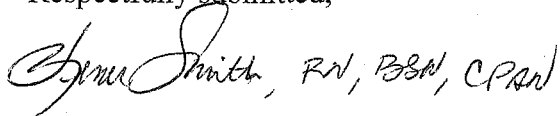
Geisinger Health System is an approved provider of continuing nursing education by the PA State Nurses Association, an accredited approver by the American Nurses Credentialing Center's Commission on Accreditation. Therefore, courses evaluated using the criteria set forth by this approval should be acceptable for the continuing education requirements as determined by the Board. However, we also provide a formidable amount of education in the form of online courses to meet regulatory requirements for nursing and ancillary staff. We are concerned that these apparently would not be considered under the Board's proposal. We would respectfully request that a grandfather clause be included that could include a limited number of hours from education at the institutional level to meet regulatory requirements. This could be gradually phased out as nurses become acclimated to the regulations and begin to obtain additional education from accredited sources.

Many online sites offer free contact hours for a variety of topics related to direct patient care, but these may not be as relevant for nurses in certain specialties and management. Our question is whether contact hours in general nursing topics would satisfy the requirements for license renewal for nurses in management and advanced practice, or must it be specific to their area of expertise? Additionally, attendance at a national conference sometimes provides the full 30 credits during a single conference. Does the Board intend to impose any limitations on receiving all contact hours from one source?

As our efforts to promote certification expand, this is another area that may deserve a pro-rated credit for obtaining or renewing specialty certification. The examinations are rigorous tests of the knowledge gained through hours of study and deserve to be recognized for their contribution to the continuing education requirements. While some certified nurses choose to recertify by meeting the continuing education credit requirements, other nurses choose to retest. Choosing the retest option requires a significant investment in study of the most current information for that specialty and should be recognized.

This legislation is long overdue as an indicator that nurses are indeed professionals and a valuable asset to the healthcare system for the knowledge and skill that they possess. As educators we need to lead the way in assuring that nurses understand the importance of this continuing education requirement, not as just another restriction placed on their practice, but as an opportunity to grow and provide the best possible care to the patients placed in our trust. We appreciate the Board's consideration of our questions and suggestions.

Respectfully submitted,

Handwritten signature of Renee Smith in cursive script.

Renee Smith, RN, BSN, CPAN

Handwritten signature of Terri Bickert in cursive script.

Terri Bickert, MSN, RN

Additional signatures attached

Additional Clinical Nurse
Educators that support
the letter.

Judy J. Barlow, RNC, BSN

Judith A. Stepe, RN

Emily Mowry RN CPN

Kimberly A. Wilson RN

Rebecca L. McCloskey RN, MS

Barbara M. Knowlton, RN

Judy A. Daines, BSN, RN, BC

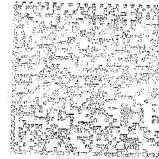
Joan F. Mewins RNC

Cathleen & Sarah RN BSN CNOR

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FIRST CLASS



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