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State Board of Nursing  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Re: Proposed Rulemaking on CE for Professional Nurses

To Members of the State Board of Nursing:

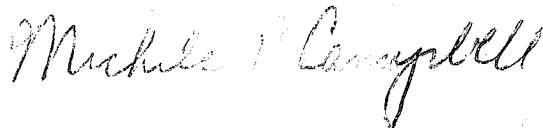
First, I want to commend you on the work you have done drafting these regulations. It is obvious that much time and effort went into this endeavor. You have been quite thorough with these amendments. Thank you.

My only concern has to do with section 21.134 Continuing Education Sources and it could be my misinterpretation of the language and/or the intent. With my history of 25 years in acute care hospital nursing coupled with the 5 years as Executive Administrator of the PA State Nurses Association, I have attended or presented many CE programs sponsored by numerous entities. The caliber of programs varied and that is my concern with the language of 21.134 (a) which is granting blanket approval to different entities just because they are those entities without placing requirements on them such as those outlined in 21.134 (b). Just because the entity is accredited and/or approved by the Department of Health or a national pharmaceutical organization does not make them a credible educational source. I have attended many CE events where there were no objectives, no evaluation process or no qualifications of the presenters evident.

My recommendation is to have the requirements under 21.134(b) pertain to all approved CE organizations unless they are an "approved" provider of CE by an accredited CE approving body such as the American Nurses Credentialing Center, American Association of Critical Care Nurses, the Oncology Nursing Society etc.

Thank you for allowing me to comment on these proposed regulations and I wish you much luck as you proceed.

Sincerely,



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