

# PSNA

Pennsylvania State  
Nurses Association

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#2608

July 17, 2007

Peggy Witmer, MSN, RN-C, MPA  
Practice Advisor  
State Board of Nursing  
P. O. Box 2649  
Harrisburg, Pa 17105-2649

Dear Peggy,

Thank you for the opportunity for Pennsylvania State Nurses Association (PSNA) to express our concerns about errors seen in The Hospital and Healthsystem Association of Pennsylvania's (HAP) comments sent regarding the proposed regulations for the Mandatory Continuing Education Law, Act 58.

In HAPs comments, page 2, Section 21.132 bullet one - HAP speaks to the recent change of PSNA to a 60 minute contact hour. This change was made by our accrediting body, the American Nurses Credentialing Center after consultation and agreement with the Accreditation Council for Continuing Medical Education (ACCME) and Accreditation Council for Pharmacy Education (ACPE). They also worked with several State Boards of Nursing including Nevada, Delaware, Florida, Mississippi and Texas.

On page 9, Section 21.134, the second major bullet point - HAP references that PSNA has a 12-week submission deadline. This is correct if an organization wants to become an approved provider not to have one educational activity approved. Also, please note that for provider applications, there is not an accelerated review process in place as is referred to in HAPs comments.

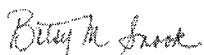
If an organization would like one educational activity approved, the submission under the normal time frame would be 8 weeks. We do have an accelerated option that must be submitted *no less* than 4 weeks prior to the educational activity taking place and the fee for the accelerated application review is double the normal submission fee.

In the last paragraph of Section 21.134, HAP incorrectly refers to PSNA as the Pennsylvania State Board of Nursing. We understand this may have been an oversight. This section refers to accelerated application fees being \$150 for an application of 0.5 to 5.0 contact hours. It is *actually* \$200, double the normal fee.

We offer a synopsis of the services and costs on our website at [www.panurses.org](http://www.panurses.org). It can be found under the Education section of the website.

Again, PSNA thanks the State Board of Nursing for the opportunity to correct these errors. We hope that you will be able to participate in some way at our Annual Summit in October. PSNA seeks all opportunities to work together to serve Pennsylvania nurses.

Sincerely,



Betsy Snook, MEd, BSN  
Executive Director  
Pennsylvania State Nurses Association



Patti Gates Smith, MSN, RNC  
Director of Professional Development  
Pennsylvania State Nurses Association

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