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**SPRING GROVE
AREA SCHOOL DISTRICT**

May 17, 2007

Ann Steffanic
Board Administrator
State Board of Nursing
PO Box 2649
Harrisburg PA 17105-2649

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INDEPENDENT REGULATORY
BOARD COMMISSION

To: State Board of Nursing

RE: PA Bulletin # 07-743; Regulation ID# 16A-5130

I would like to express the following comments with regards to the proposed regulations for continuing education for registered nurses.

Section 21.29

I support these changes with regards to license renewal. Thank you.

Section 21.133

With regards to the content of continuing education activities, I request that the board give additional consideration to nurses practicing outside of the traditional hospital setting. I am a certified school nurse, and courses that may traditionally be part of a curriculum for an educator or even a physical fitness instructor would be very applicable to the work I do on a daily basis. I would also ask that the board consider the implications for certified school nurses to be held to a double standard. We currently must meet the standards of the Pennsylvania Department of Education for Act 48. I would ask that the board consider accepting hours that have been approved by PDE for Act 48 as continuing education hours for license renewal.

Section 21.5

With regards to the proposed fees for approval of continuing education hours, I find these to be exorbitant. To have a nurse pay \$2250 every two years to renew a professional license is outlandish. I do not make that kind of salary working in a school district, and furthermore, when I submit hours to PDE for Act 48 approval, I am not asked to pay for the department's approval of those hours. I would find these fees to be a hardship if they were passed along to me as an individual nurse, and it would cause me to consider leaving the profession for other opportunities if the fee is kept at the proposed rate.

I appreciate the opportunity to comment on these proposed regulations.

Sincerely,

Lisa M Bahn, RN, M.Ed
CC: IRRC

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