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September 21, 2007

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

Re: Proposed Rulemaking, 49 PA. Code Ch. 21

Dear Ms. Steffanic,

I am writing to comment on the proposed rulemaking published in the PA Bulletin on August 25, 2007.

Currently, I serve as Director of the St. Luke's School of Nursing, Diploma Program, in Bethlehem, PA.

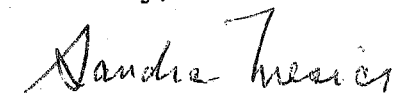
Overall, I feel the changes are very positive, and go a long way to improving nursing education in Pennsylvania.

I do have some concerns about eliminating § 21.74, as it sets forth minimum requirements for diploma program support services (i.e., one secretary, and a librarian.) The new § 21.71 (5) is a little more vague. I don't suppose there is a way to incorporate those minimum standards into the language of § 21.71 (5), such as: "Program support services, including administrative and clerical services, but no less than one full-time secretary and a full-time librarian."

Also, under (c) Faculty qualifications, (1) "Faculty members teaching required clinical nursing education courses shall hold..." I think taking out the word "clinical" would make this cleaner.

Thank you for the opportunity to comment on the proposed rule changes.

Sincerely,



Sandra Mesics, RN, MSN, CNM

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