

From: [Tom Dougherty](#)
To: [ST, RegulatoryCounsel](#)
Subject: [External] BPOA PROPOSED regulation #16A-66 (IRRC #3361): "Consideration of Criminal Convictions"
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To whom it may concern:

Pennsylvania State Nurses Association (PSNA) is opposed to the most recent list of crimes proposed by the Board in relation to rulemaking for Regulation #16A-66. The Board's current list of crimes is neither equitable nor are many of the crimes directly related to the practice of the profession. PSNA and our allies believe that the Board, in publishing the list in its current form, has misinterpreted the intent of Act 53. Senator John DiSanto, the prime sponsor of the legislation, wrote in a memo that the purpose of his bill was to "require that boards only withhold a license for convictions which are **directly related** to the practice of the occupation." With this in mind, PSNA encourages the Board to consider that crimes such as writing bad checks or threatening to use weapons of mass destruction are neither directly related to the profession nor remotely related to nursing.

The most concerning aspect of this process has been that our colleagues who are licensed under the State Board of Medicine are being held to a different set of standards, even though the nature of our work is similar. The lists for the State Boards of Medicine, Osteopathic Medicine, and Nursing should be very similar due to the similar nature of our work. Applicants for licenses under the State Board of Nursing should not be held to a different standard than their colleagues seeking licensure from the State Board of Medicine.

While the initial list of crimes proposed by this Board was concerning, there is still an opportunity to make this right. I urge this Board to create a subcommittee, comprised of both stakeholders and Board members, to collaborate with the Commonwealth's nursing organizations on a list of crimes that genuinely relate **directly** to the profession of nursing. We hope the Board will work with stakeholders on this issue and others in the future.

Deborah Cardenas, DNP, MSN, RN, Paralegal, CPHQ
President, Pennsylvania State Nurses Association (PSNA)