



**VIRGINIA ASSOCIATION OF SCHOOL NURSES, INC.**  
**P.O. BOX 28313, RICHMOND, VA 23228**

November 2, 2012

Jay P. Douglas, RN, MSM, CSAC  
Executive Director  
Virginia Board of Nursing  
Perimeter Center  
9960 Mayland Drive, Suite 300  
Henrico Virginia 23233-1463

Dear Ms. Douglas,

The Virginia Association of School Nurses thanks you and the Board of Nursing for the opportunity to make public comment regarding the proposed regulations on [continued competency requirements](#) for renewal of active nursing licenses. Our Association strongly endorses the Board's proposed regulations for both continued competency and documentation requirements which demonstrate compliance with the continued competency requirements. Virginians are entitled to safe, quality nursing care that is based upon research and best practices. These new regulations help to assure the public that Virginia nurses are knowledgeable and safe practitioners.

The scope and standards of practice for many nursing specialties hold that the nurse must acquire and maintain current knowledge and competency in nursing practice. Competence is dynamic and impacted by many factors as nurses enter new situations and roles. These proposed regulations ensure accountability for consistent participation in educational activities related to current clinical knowledge and professional issues. The proposed recommendations allow adequate flexibility for the licensee to maintain the knowledge and skills that are appropriate to one's specific nursing practice area. They provide a minimum state standard for indicators of both experience and education. This will benefit school nurses who voluntarily seek to attend professional development programs but may not have employer support to do so because continuing education is not mandated for licensure. We believe that ongoing professional growth is essential to the delivery of safe and effective care of the public and to the advancement of the nursing profession.

The Virginia Board of Nursing is to be commended for its actions to safeguard the public in the Commonwealth. It is our hope that this initiative will aid in insuring the public health, safety, and welfare of individuals, families, and communities who receive nursing care in Virginia. Thank you for your consideration on this most important issue.

Sincerely,

*Deborah Zeller*

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