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July 20, 2018

West Virginia Board of Examiners for Registered Professional Nurses
Dr. Sue Painter, Executive Director
90 MacCorkle Avenue, SW, Suite 203
Charleston, WV
Email: sue.a.painter@wv.gov

Dear Board Members,

The West Virginia Nurses Association (WVNA) appreciates the opportunity to comment on the proposed Title 19 Series 12 Legislative Rule (19CSR12) related to Fees for Services Rendered by the Board and Supplemental Renewal Fee for the Center for Nursing.

We appreciate the removal of the requirement for money orders or cashier's checks in §19-12-2 as that language and requirement is outdated and unnecessarily burdensome.

While historically present, the rule in §19-12-2.6 and 2.7 is confusing as written. Under §19-12.2.6 the \$65.00 for renewal of license states it includes \$10.00 for the Center for Nursing and \$15 for a nurse recovery fund. Then §19-12-2.7 lists a \$10.00 supplemental renewal fee for the Center for Nursing. There is not a separate line for the \$15 nurse recovery fund. Is the \$10 Supplemental Renewal Fee for the Center in §19-12-2.7 voluntary and/or in addition to a \$10 fee included in the \$65 licensure renewal fee? If not, why is it listed separate when the Recovery Fund fee is not separately listed? Are nurses expected to pay a total of \$20 to the Center or \$10?

For clarity and transparency it would be helpful to either list out each of those elements separately such as:

2.6. Renewal of License	\$40
2.7 Supplemental Renewal Fee for the Center for Nursing.....	\$10
2.8 Supplemental Renewal Fee for Nurse Recovery Program.....	\$15

Or include them all in one line with a subsequent explanation and delete line 2.7 in the current proposed rule completely.

Such as:

2.6 Renewal of License.....	\$65
(includes \$10 for Center for Nursing and \$15 for Nurse Recovery Program)	

We appreciate your consideration of our comments and suggestions.

Warmest regards,

Toni DiChiacchio

Dr. Toni DiChiacchio, DNP, APRN, FNP-BC, CEN, FAANP
President, West Virginia Nurses Association

Dr. Sue Painter, DNP, RN
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STATE OF WEST VIRGINIA
BOARD OF EXAMINERS FOR REGISTERED PROFESSIONAL NURSES
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July 26, 2018

Dr. Toni DiChiacchio, DNP, APRN, FNP-BC, CEN, FAANP
President – West Virginia Nurses Association
P.O. Box 1946
Charleston, West Virginia 25327

Dear Dr. DiChiacchio:

The West Virginia Board of Examiners for Registered Professional Nurses appreciates the letter from the West Virginia Nurses Association. The Board considered your comments related to 19CSR12 and made the suggested clarification for transparency.

The modified rules will be available for review through the Secretary of State's web site by July 27, 2018.

For the Board,

A handwritten signature in cursive script that reads "Sue Painter".

Sue Painter DNP RN
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