

From: [Heather Amos](#)
To: [Audrea Racine](#)
Subject: LSA Document #24-114 Requirements to Practice as a Forensic Nurse; Continuing Education
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Indiana Board of Nursing

ATTN: Audrea Racine, JD

402 West Washington Street

Room W 072

Indianapolis, IN 46204

RE: LSA Document #24-114 Requirements to Practice as a Forensic Nurse; Continuing Education

Dear Indiana Stae Board of Nursing:

I am wrting about my concerns for the Forensic Nursing Education Rule (LSA Document #24-114). I speak solely for myself and not necessarily that of my employer.

I have been a Forensic Nurse since 2017, I attended the evidence-based course in Marion County, which is now offered through the Indiana Emergency Nurses Association (IENA), and most recently taken over by IUH and IUSON.

I appreciate your time and the careful consideration of those that have submitted concerns on the first proposal and the adjustments that have been made. I just have a few other questions for clarification if you would. My concerns with this new Indiana Code are listed below.

My first concern is that The ISDOH Sane Coordinator is a grant funded position. The Sane project that is being referenced is also a grant funded project. The ISDOH Sane Coordinator teaches at the Sane Project. The SANE PROJECT sits on the ISBN. There is obvious conflict of interest, additionally, this was asked in the previous meeting by multiple individuals and a vague response was given. I have copied and pasted the comments from ISBN below.

- Comment: Commenter indicated that the SANE Project and Indiana SANE Coordinator positions are grant funded and asked what the plan is if the grant funding is no longer available.

- Response: This question is outside the scope of this rulemaking.

I feel that this is absolutely within the ability of the Board as you have both the ISDOH and SANE PROJECT listed in this Code. IF THESE PROGRAMS GO AWAY, which are BOTH Federally funded programs, what happens to the validity of this code? What does the board have planned if this happens?

It is very hard to shake the feeling that this is a monopoly with only one “approved training” If the standard is being set to be like the SANE project, what kind of review process is in place to ensure that they are teaching up to date, current standards? Does the SANE Project have to have practicing Forensic Nurses teaching their classes? Who does the ISDOH SANE Coordinator report to? Is there a reporting structure that will be in place if this code continues forward and a job description posted of the ISDOH SANE PROJECT COORDINATOR?

As a member of the board, you may not know that a forensic nurse can see patients that are victims of Sexual Assault, Interpersonal Violence, and physical assaults as well as other acts of violence. You do not have to have a SANE Certification to complete Sexual Assault exams if you have taken a

Forensic Nursing course. There are other certifications out there besides the SANE -A and SANE -P such as the GFN – BC that encompasses all Forensic Nursing vs just specifically Sexual Assaults. Many facilities see far beyond just the sexual assault patient. In this field, many are trending to stop calling SANE RNs, SANE’s and instead call them FORENSIC RNs because it encompasses more of what we do.

So I ask, if I am a Forensic Nurse but NOT SANE -A or SANE -P Certified, am I required to have CEs? The verbiage in paragraph (g) states “Requirements to practice as a forensic nurse” however, throughout the document SANE RN is used interchangeably and they are not the same. Additionally, where will the “allowed” CEs be posted so that I may be selective with some of my continued education to make sure it is approved.

If my Forensic Training was in 2017, will I be required to retake classes to meet the standards of the code or will I be grandfathered in with that education?

Lastly, what was the original intent of this rulemaking, and have we gone outside of what the original intent was?

Thank you for your time.

Sincerely,

Heather Amos

