November 1, 2020

Board of Registration in Nursing

239 Causeway St., Suite 500, 5th Floor

Boston, MA 02114

Dear Board Members,

I am writing this letter on behalf of the Cape Cod Community College to urgently request your support in removing the proposed regulation revision for 244 CMR 6.04 2 (b)4. c. (iii) (a)-Faculty qualifications. We request that the proposed language requiring appointment before effective date of regulation be removed from the proposed regulations. The most recent proposed change (March 2020) would limit the option to utilize BSN prepared, part-time faculty, in particular Waiver Option 3. I request the proposed language requiring appointment of BSN prepared lab and clinical faculty before the effective date of regulation be removed from proposed regulations.

This proposed change would eliminate the option to hire new part time faculty who are experienced to teach in the clinical or laboratory setting but have a BSN and not a master’s degree. Although hiring master’s prepared faculty is always the preferred option, we are facing a significant nursing faculty shortage in our state and region. This shortage is well supported to be due in part to the inequity in pay between academia and practice.

The Waiver Option 3 is a necessary regulation helping nursing programs to educate professional nurses. Without Waiver Option 3, many Massachusetts nursing programs will face decreasing enrollments of students due to the lack of available faculty for clinical and lab experiences. This presents a dire situation for geographically isolated programs due to the lack of masters prepared educators. Currently, nursing programs are facing a significant nursing faculty shortage. This is well documented in research and publications, specifically done by the Massachusetts Action Coalition1,2,3. Barriers to nurses becoming nurse faculty include pay inequities with practice, need for advanced education and scholarship requirements. If eliminated, the use of BSN prepared faculty in the clinical areas could well result in some programs closing.

Removal of this proposed change is necessary to help our programs continue to educate professional nurses in our commonwealth. Through our diverse nursing program students, our programs play an important part in meeting the workforce needs of the Commonwealth, as well as the DHE Equity Agenda, which states “ The Massachusetts system of public higher education will enhance economic and social mobility for all citizens, but particularly for those that have historically been underserved and underrepresented, especially students of color, throughout all levels of education”. Cape Cod Community College administration and faculty who directly education and overseeing our nursing programs, are deeply concerned about the impact of this proposed regulation on our programs, our institution and our community.

It is increasingly difficult to fill full-time faculty positions with MSN prepared faculty, which often results in failed searches or searches with only one qualified candidate. Currently we have 7 of 33 of our full and part time faculty with a BSN who are teaching medical/surgical nursing at their perspective hospitals. Nursing programs need their expertise of clinical practice. Having the ability to hire BSN prepared part time faculty allows us to build on their clinical expertise and mentor them in the educator role. It is not unusual for these faculty to then enroll in an MSN program.

Nursing programs across the Commonwealth graduate approximately 4045 nurses every year based on the 2016 data published on the MABORN website. Massachusetts programs currently employ over 110 BSN prepared nurses as clinical and laboratory faculty based on a survey of the Associate Degree and Diploma Programs in Massachusetts Spring 2020. If this language is not removed from the proposed regulations, many Massachusetts nursing programs will be unable to maintain our current enrollment of students. We will no longer be able to graduate the number of new nurses to meet the current and future workforce needs. Less populated areas of the state will be disproportionally impacted, as they have even fewer potential faculty candidates to draw on.

Thank- you for the opportunity to provide public comment on these issues. It is important to our Nursing Programs, faculty, administrators and staff that our concerns are heard, and recommendation be included in the changes in *244 CMR 6.00 Approval of Nursing Education Programs, Standards and Procedures.* We appreciate your commitment to review this evidenced based testimony so that our programs can continue to provide quality, affordable education to the next generation of nurses.

Submitted by,

Audrey Kilcoyne

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Interim Director Nursing Program

Cape Cod Community College

As we are all aware, attracting, hiring, and retaining nursing faculty is a challenge through the state based on high demand, low supply, and faculty salaries that struggle to be competitive against other nursing opportunities a potential hire could pursue. We in the Cape Cod region are additionally challenged to attract, hire, and retain potential nursing faculty given our relative geographic isolation and our housing costs. If we were to limit our pool of potential nursing faculty to only those Master’s or higher prepared faculty while turning away enthusiastic and willing potential nursing faculty who are clinically experienced and BSN-prepared, we will have lost a significant instructional resource without any guarantee that we will find sufficient numbers of MSN-prepared clinical and lab faculty to take their place.

We respectfully request the Board to reconsider this proposed change to the 244 CMR 6.04 2 (b) 4.c.(iii).