November 5, 2020

Board of Registration in Nursing

239 Causeway Street, Suite 500

Boston, MA 02114

**Re:** **Proposed Changes to 244 CMR 6.04 2 (b) 4.c.(iii)**

Dear Board Members:

We write this letter on behalf of the Cape Cod Community College Board of Trustees, administrators, and nursing faculty to share our concerns regarding the proposed changes of the 244 CMR 6.04 2 (b) 4.c.(iii).- Faculty Qualifications as proposed most recently in March 2020. We request the proposed language requiring appointment before effective date of regulation be removed from the regulations.

The proposal to eliminate the Waiver #3 option allowing the hiring of BSN faculty for clinical and laboratory instruction will have a direct negative impact on our ability to attract, hire and retain nursing educators in sufficient numbers for our program. In restricting the pool of qualified nursing educators from which we can hire, we will subsequently be required to limit the seats we can offer for enrollment, thereby exacerbating the already well documented shortage of registered nurses entering the workforce, specifically, in our area and in Massachusetts in general.

In our capacities as the President and Chair of the Board of Trustees, respectively, of Cape Cod Community College, we are uniquely positioned to hear the concerns expressed about this proposed change from both nursing program administrators and faculty. Equally as important, we are hearing the concerns of our external healthcare provider employers in our service area. While serving an aging population across our region requiring anticipated increasing levels of healthcare in coming years, Cape Cod Community College works closely with our healthcare provider partners in hospitals, community health centers, and long term care facilities to provide nursing graduates who can qualify for their R.N. license and help fill the pressing nursing employment needs of the region. This service to our community is only possible by the College having a sufficient number of qualified nursing educators from which to draw, including instructors who are qualified under Waiver #3. If we lose access to BSN prepared nursing clinical and lab faculty who would qualify for a waiver under Option #3, we would not be able to fulfill our mission to our service area and our healthcare partners.

As we are all aware, attracting, hiring, and retaining nursing faculty is a challenge throughout 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. In the Cape Cod region, we are additionally challenged to attract, hire, and retain potential nursing faculty given our relative geographic isolation and high housing costs. If we were to further 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).

 Yours sincerely,

/s/ Tammy Saben /s/ John L. Cox

Tammy A. Saben, Chair John L. Cox, EdD, CPA, President