December 27, 2019

To the Massachusetts Board of Registration in Nursing:

On behalf of The Committee of Practical Nurse Education Programs (PN Ed Committee) of the Massachusetts Rhode Island League for Nursing (MARILN), I would like to submit the following comments to *244 CMR 10.00 Definitions and Severability*.

We appreciate the Massachusetts Board of Registration in Nursing (BORN) moving forward with revisions to the regulations. Nursing education and practice has evolved significantly since many of the current regulations were promulgated.

The PN Ed Committee closely reviewed the proposed revisions to the definitions found at 244 CMR 10.00. We support the language as proposed and as will be applied in the other regulations; specifically *244 CMR 6.00 Nursing Education Programs and the Conduct Thereof*.

We do want to insure that the preceptor, as defined in *244 CMR 6.00* will be educated and licensed at the level of the student nurse they will be precepting. This requirement was contained in the draft language to *244 CMR 10.00* that went to public comment in October 2017, however is omitted in this current definition.

As we anticipate that a public hearing on the regulations at *244 CMR 6.00* will occur, the PN Ed Committee wishes to make a comment as to the role of the Program Administrator. As currently defined in *244 CMR 6.00*, the administrator is listed under the definition of faculty at *244 CMR 6.04(2) Faculty Qualifications*, *(a) Administrator*. The BORN has made clear, with their findings and requirements for corrective action, that the administrator has full-time responsibility for the administration of the nursing education program; however, due to collective bargaining agreements, faculty are required to have teaching responsibilities. If the administrator remains identified as a member of the nursing program faculty as currently published at 244 CMR 6.04(2), this issue will continue to be problematic for Nursing Education Programs.

The PN Ed Committee looks forward to the opportunity to further comment on *244 CMR 6.00* in the near future.

Respectfully submitted,

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