October 30, 2020

Board of Registration in Nursing

239 Causeway St., Suite 500, 5th Floor

Boston, MA 02114

Dear Board Members,

We are writing this letter on behalf of the Massachusetts Community College Health Deans to urgently request your support in removing the proposed regulation revision for 244 CMR 6.04 2 (b)4. c. (iii) (a)-Faculty qualifications. The most recent proposed change (March 2020) would limit the option to utilize BSN prepared, part time faculty. We request that the proposed language requiring appointment before effective date of regulation be removed from the 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. This is particularly relevant in specialized areas such as pediatrics, maternity, and mental health nursing. 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 is well documented in research and publications (Massachusetts Action Coalition1,2,3). This shortage is due in part to the inequity in pay between academia and practice. 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 multiple unfilled full-time positions across the community college system, which necessitates the additional use of part-time faculty.

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 discover a passion for teaching and seek to continue their education.

Removal of this proposed change is necessary to help our programs continue to educate professional nurses. 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”. As Health Deans overseeing these nursing programs, we are deeply concerned about the impact of this proposed regulation on our programs, our institution and our community.

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.

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.

Sincerely,

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| **Lori Moon**  Lori Moon, Dean of Nursing  Berkshire Community College | **Simisola Akindele**  Simisola Akindele, Associate Dean of Nursing  Bristol Community College |
| **Maryanne Atkinson**  Maryanne Atkinson, Dean of Health Sciences  Bunker Hill Community College | **Patrick Preston**  Patrick Preston, http://pixel-geo.prfct.co/cs/?partnerId=twtrhttp://pixel-geo.prfct.co/cs/?partnerId=yahhttp://pixel-geo.prfct.co/cs/?partnerId=fbxhttp://pixel-geo.prfct.co/cs/?partnerId=crwhttp://pixel-geo.prfct.co/seg/?add=2938102&source=js_tag&a_id=46475http://ib.adnxs.com/seg?t=2&add=2938102http://pixel-geo.prfct.co/cs/?partnerId=mrinhttp://pixel-geo.prfct.co/cs/?partnerId=gooDean of Health Sciences  Cape Cod Community College |
| **Karyn Skiathitis**  Karyn Skiathitis, Asst. Dean of Nursing  Greenfield Community College | **Clare Lamontagne**  Clare Lamontagne, Dean of Health Sciences  Holyoke Community College |
| **Catherine Powers Ozyurt**  Catherine Powers Ozyurt, Dean,  Nursing and Allied Health  Massasoit Community College | **Lynne Davis**  Lynne Davis, Dean of Health Sciences  MassBay Community College |
| **Katherine Gehly**  Katherine Gehly, Dean,  Nursing and Allied Health  Middlesex Community College | **Margaret Jaillet**  Margaret Jaillet, Dean of Health Professions, Public Service Programs and Social Sciences, Mount Wachusett Community College |
| **Scott Lancaster**  Scott Lancaster, Dean of Health Professions, Northern Essex Community College | **Lori Vinci**  Lori Vinci, Dean,  Health Professions and Human Services  North Shore Community College |
| **Pat Schmohl**  Pat Schmohl, Dean of School of Health Care  Quinsigamond Community College | **Christopher Scott**  Christopher Scott, Dean,  School of Health and Patient Simulation  Springfield Tech Community College |

1 Bittner, N & Bechtel, C (2017). *Identifying and Describing Faculty Workload Issues: A Looming Faculty Shortage.* Nursing Education Perspectives. [July/August 2017 - Volume 38 - Issue 4 - p 171–176](http://journals.lww.com/neponline/pages/currenttoc.aspx)

2Bittner, N., Bechtel, C. Frontiero, L., Kowal, N., & Silveira, C. (2015) *Nursing Faculty Workload Survey 2015: Summary Report*.Robert Wood Johnson APIN Grant;Massachusetts Action Coalition, December 2015.

3Manning, K., Bittner, N. Seymour-Route, P. & Bechtel, C. (2014) *Nursing Faculty Workforce Challenges in Massachusetts*. Massachusetts Action Coalition White Paper, December 2014.