# Office of the President



Board of Registration in Nursing

239 Causeway St., Suite 500, 5th Floor

Boston, MA 02114

October 28, 2020

Dear Board of Registration in Nursing,

On behalf of Greenfield Community College—its Board, students, faculty, staff, and the community that we serve—I thank the Board for its important work to ensure high quality in the preparation and care of all residents under BORN’s jurisdiction. I write today in opposition of the proposed regulation revision of 244 CMR 6.04 2 (b)4. c. (iii) (a)-Faculty qualifications and the elimination of Waiver 3.

Franklin county is the most rural region in Massachusetts and we are already challenged with meeting the current demands for nursing and other health professionals, let alone the projected shortages as our population continues to grow older. Eliminating Waiver Option 3 will deepen the inequalities that plague our rural communities that are among the poorest in Massachusetts, with a dispersed geographic spread, limited transportation, lacking internet in many towns and many other amenities that cities and suburbs enjoy. To us, this is a question of equity. Our aging and younger populations deserve nurses and our ability to prepare these healthcare professionals will be severely constrained by the newly proposed regulation.

In addition to retaining Waiver Option 3, on behalf of our stakeholders, I also write to request a change in the date to achieve candidacy status for accreditation to support Practical Nurse programs. The College recommends that the date for candidacy status be extended to December 31, 2022 and the date for initial accreditation remain at December 31, 2025. This timeline for initial candidacy will ensure adequate time for us and other colleges facing similar constraints to prepare for candidacy with the level of high quality that BORN expects and of which we know that we are capable.

I thank you for this opportunity to submit written testimony. I do hope that the Board will make the most equitable decision in support of the needs of the Commonwealth.



Respectfully,

Yves Salomon-Fernandez, Ph.D.