November 6, 2020

To the Massachusetts Board of Registration in Nursing,

The Department of Nursing faculty and professional staff of the Practical Nurse and Associate in Science in Nursing at Holyoke Community College are writing in support of the testimony that was provided on Thursday October 29, 2020 at the Massachusetts Board of Nursing Public Hearing on the proposed amendments to the Board’s regulation at *244 CMR 6.00*, setting the standards and procedures for approval of nursing education programs.

We believe our support of the testimony is critical in light of the lack of pre-licensure nurse education representation within the current Board members. We are concerned that the faculty of practical nurse and associate degree and diploma registered nurse programs are not adequately represented by the single pre-licensure baccalaureate educator currently on the Board. The student population served by PN and AD programs, and the challenges they face to successfully graduate, is vastly different than those individuals that apply to and enroll in baccalaureate programs.

In summary, we endorse the language at *244 CMR 6.04 (2) (c) Preceptors*; we request the date to obtain candidacy for program accreditation be moved to December 31, 2022; we endorse elimination of the minimum number of hours in practical nurse education programs; and, we oppose the change to the language at *244 CMR 6.04 (b) 4.c.iii. (a)* that effectively eliminates the Waiver Option #3 for skills lab and clinical instructors in registered nurse education programs.

We appreciate the opportunity to participate in this important regulatory process.

Thank you,

Holyoke Community College Department of Nursing Faculty and Professional Staff