

Board of Registration in Nursing,

239 Causeway St., Suite 500, 5th Floor,

Boston, MA 02114

October 30, 2020

Dear Board of Registration in Nursing:

On behalf of the MARILN Associate Degree and Diploma Committee I am providing this testimony on 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, in particular Waiver Option 3. I request the proposed language requiring appointment of BSN prepared lab and clinical faculty before the effective date of regulation be removed from proposed regulations. The proposed change will eliminate the ability to hire experienced BSN prepared faculty for clinical and laboratory teaching. Programs will lose the ability to share faculty who teach in specialized areas such as pediatrics, maternity and mental health. Nursing Education programs at all levels benefit from the Waiver Option 3. Elimination of the waiver option 3 may create a shortage of clinical and skills faculty which in turn will limit the ability to accept students into programs, reducing the number of nurses being educated to enter the nursing workforce.

The Waiver Option 3 is necessary regulation helping nursing programs to educate professional nurses. Without Waiver Option 3, many Massachusetts nursing programs will face decreasing enrollments of students due to the lack of available faculty for clinical and lab experiences. This presents a dire situation for geographically isolated programs due to the lack of masters prepared educators. Currently, nursing programs are facing a significant nursing faculty shortage. This is well documented in research and publications, specifically done by the Massachusetts Action Coalition1,2,3. Barriers to nurses becoming nurse faculty include pay inequities with practice, need for advanced education and scholarship requirements. If eliminated, the use of BSN prepared faculty in the clinical areas could well result in some programs closing.

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. We live in a health care environment where the need for nurses continues to grow. I appreciate your commitment to review this evidenced-based testimony so that our programs can continue to provide quality, affordable education for the next generation of nurses.

I also request a change in the date to acquire candidacy status for accreditation to support the 16 Practical Nurse Programs in the Commonwealth without accreditation by a MABORN recognized accrediting agency. *244 CMR 6.04(1) Program Accreditation, Mission, and Governance*. The December 31, 2020 date to obtain candidacy is not obtainable for Programs. The time and expense to obtain accreditation needs careful planning and budgeting as accreditation expenses have significant impact on the budgets at many Practical Nursing Programs, coupled with the financial strains created by the covid- 19 pandemic.

I recommend the date for candidacy status be extended to December 31, 2022 and the date for initial accreditation remain at December 31, 2025. Extending the date for initial candidacy will provide sufficient time for the schools to prepare for candidacy.

At this time there is only one pre-licensure representative serving on the MABORN. The Associate Degree Diploma Committee requests that appropriate action be taken by the MABORN and community of interest to support the appointment of members with expertise in all types of pre-licensure programs, including practical nursing, associate degree, baccalaureate and higher-level programs preparing students for entry in to nursing practice.

Thank- you for the opportunity to provide public comment on these issues. It is important to our Nursing Programs, faculty, administrators and staff that our concerns are heard and recommendation be included in the changes in *244 CMR 6.00 Approval of Nursing Education Programs, Standards and Procedures.*

Submitted by,

Susan Maciewicz

Susan Maciewicz MSN RN CNE CHSE

Associate Degree Diploma Committee Chairperson

On behalf of the MARILN Associate Degree and Diploma Committee

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.