April 9, 2020

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), we would like to submit the following comments to *244 CMR 6.00 Approval of Nursing Education Programs, Standards and Procedures*.

The PN Ed Committee strongly endorses the language at *244 CMR 6.04(2)(c) Preceptors.* The members look forward to having this method of nursing education instruction available. A preceptorship facilitates the transition from student to practitioner and provides an opportunity for students to synthesize clinical knowledge and professional role modeling practices while enrolled in nursing programs across the Commonwealth.

We are also looking forward to the elimination of the minimum program length and minimum clock hours as proposed. Pedagogy in nursing education continues to evolve and flexibility in delivering the curriculum to achieve program outcomes will allow nursing education programs to embrace evidenced based teaching methods and practices. This flexibility will facilitate the development of educational models that will provide more options for the licensed practical nurse who intends to continue their education to registered nurse licensure.

With regard to 244 CMR 6.04 (1) Program Accreditation, Mission, and Governance, there are currently 16 Practical Nurse Programs in the Commonwealth that do not have program accreditation nor accreditation candidacy. The members endorse the attainment of program accreditation, however, the deadlines as currently proposed are not attainable; specifically, the December 31, 2020 date to obtain candidacy. The cost for this endeavor has not been included in our respective budgets for Fiscal Year 20/21 which has already been submitted and approved by the respective parent institutions. In addition to the cost of obtaining accreditation (approximately $13,000), there is an ongoing annual cost for maintaining accreditation (approximately $3,000.00) that will need to be included in budget planning. As the cost of accreditation will most likely increase the tuition costs at these 16 programs, additional time is needed to evaluate budgets and identify funding sources. Should this mean an increased cost to the student, it will need to be published for the purpose of applicants planning to apply and enroll in one of these programs. As of today, tuition costs and fees have been published for the 20/21 academic year.

The PN Ed Committee requests the date for programs with Full Approval to obtain candidacy be changed to December 31, 2022 and retain the date of December 31, 2025 to obtain program

accreditation which is in accordance with both ACEN and CNEA candidacy timeline of 3 years. Changing candidacy date to December 31, 2022, will provide adequate time to prepare necessary budgets and publish any changes to program costs.

The PN Committee is opposed to the insertion of an effective date to the appointment of registered nurse clinical or skills lab faculty that has been added to *244 CMR 6.04 (b) 4. c. iii. (a)* [i.e. the current Waiver Option 3 that is provided in current Education Policy 02-02]. This recommendation was **not** made by the taskforce that proposed the revisions to the regulations; in fact, the recommendation of the task force was to include the criteria that exists in the Education Policy 02-02 in these revised regulations. There is no supporting data provided by the Board as to the source of this change. Without a reconvening of the task force it is not clear to the pre-licensure nursing education community there is evidence to support the elimination of Waiver Option 3 criteria.

In accordance with data published in the Health Professions Data Series –Licensed Practical Nurse 2015, by the Massachusetts Department of Public Health, 30.9% of LPNs reported being currently enrolled or making plans to enroll in and RN education program. The majority of LPNs in RN programs reported being enrolled in an Associate Degree Program. If nursing education programs do not have adequate clinical and skills lab faculty, the opportunity for LPNs to advance their education will be curtailed.

We appreciate the opportunity to participate in this extremely important regulatory process; it is particularly important in the absence of a practical nurse and associate degree registered nurse educator serving on the Board. It is imperative that the pre-licensure nursing education community be heard on these issues as there is only 1 pre-licensure educator representing the entire pre-licensure nursing education community.

Respectfully submitted,

Committee of Practical Nurse Education Programs

Massachusetts Rhode Island League for Nursing

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