

Board of Registration in Nursing,

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

Boston, MA 02114

October 29, 2020

Dear Board of Registration in Nursing,

I am writing this letter 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 utilized BSN prepared, part time faculty. We request that the proposed language on page seven requiring appointment before effective date of regulation be removed from proposed regulations. The proposed change will eliminate the option to hire needed, experienced BSN-prepared faculty for clinical and laboratory instruction. Programs will lose the ability to hire clinical faculty experts who not only bring practice expertise in specialized areas such as pediatrics, maternity and mental health, but also, oftentimes, those who are competent and proficient practitioners, who are most eager to teach our students. Furthermore, these are the professionals who have been practicing five-ten years, bringing new enthusiasm and dedication to the future generation. Currently BSN clinical instructors are drawn from the majority of BSN prepared nurses in Massachusetts who work primarily in inpatient academic and community hospitals, and who share their best knowledge, skills, and values related to clinical judgment, decision-making, and professional identity formation, to our students.

Removal of this proposed change is necessary to help our programs continue to educate the next generation of professional nurses. Without this action, due to the lack of available faculty for clinical and lab experiences, Massachusetts nursing programs can anticipate increasing challenges with decreasing enrollments of students, at a time when we need to increase our nursing workforce, in long-term care, rehabilitative care, home care, and palliative and hospice care, and community care, in particular. Particularly, for our vulnerable programs which are geographically isolated, this presents a dire situation due to the lack of masters prepared educators. As you are aware, currently, nursing programs are demonstrating a significant nursing faculty shortage, backed by evidence from recent research findings and shared in recent publications, specifically conducted and published 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. The burden of eliminating the use of BSN-prepared faculty in clinical education will likely result in untoward consequences, including possible closure of much needed new programs in BSN- Accelerated Option programs, for example, for second degree students.

Nursing programs across the Commonwealth graduate approximately 4045 nurses every year based on the 2016 data published on the MA-BORN 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; with numbers even higher in our BSN nursing programs.



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 in Massachusetts. We encourage you to make decisions based on Competencies, rather than degrees. An important question that may not have been fully explored is- ***What are the competencies required for excellent, quality Clinical Instruction in our academic nursing programs?***

Competencies for academic clinical educators have already been delineated- See Addendum.

We urge you to include these in your recommendations. We encourage you to conduct a statewide survey and then study clinical instructors who are certified in Academic Clinical Education and consider a pilot study examining clinical instructors who become certified as Clinical Instructors, taking a Certification Exam by both BSN and MSN prepared faculty since we know very few , if any, MSN programs provide specialized knowledge and skills in Clinical Education. ***We need to base our decisions on evidence-based, specialized, competencies, which demonstrate the specialized expertise required for academic Clinical Instructors\*.***

Sincerely,

***JoAnn Mulready-Shick, EdD, RN, CNE, ANEF***

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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.



**ADDENDUM:**

**Clinical Instructor Competencies**

1. Function within the Education and Health Care Environments (19%)

1. Function in the Clinical Educator Role
2. Operationalize the Curriculum
3. Abide by Legal Requirements, Ethical Guidelines, Agency Policies, and Guiding Framework

2. Facilitate Learning in the Health Care Environment (19%)

3. Demonstrate Effective Interpersonal Communication and Collaborative Interprofessional Relationships (15%)

4. Applies Clinical Expertise in the Health Care Environment (15%)

5. Facilitate Learner Development and Socialization (15%)

6. Implement Effective Clinical Assessment and Evaluation Strategies (17%)

The ***Academic Clinical Nurse Educator Certification Exam*** was created for academic clinical nurse educators to demonstrate expertise in this role. The academic clinical nurse educator facilitates the learning of nursing students throughout clinical components of an academic nursing program. This educator is guided in this role by faculty of the nursing program and is accountable to that nursing program for providing fair evaluations of learners' performance in meeting expected learning outcomes. The academic clinical nurse educator may have a variety of titles depending on the classification used by the specific nursing education program (e.g., clinical faculty, part-time faulty, adjunct faculty, clinical instructor, or preceptor).

*Goals of CNE®cl Certification:*

-Distinguish academic clinical nursing education as a specialty area of practice.

-Recognize the academic clinical nurse educator’s specialized knowledge, skills and abilities and excellence in clinical teaching.

-Strengthen the use of selected core competencies of academic clinical nurse educator practice.

-Contribute to academic clinical nurse educators’ professional development.

Retrieved from <http://www.nln.org/Certification-for-Nurse-Educators/cnecl>