Board of Registration in Nursing,

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

Boston, MA 02114

October 29, 2020

Members of the Massachusetts Board of Nursing, my name is James Mabry and I am the President of Middlesex Community College and the Chair of the MA Community College Council of Presidents. On behalf of all fifteen presidents, I want to thank you for the opportunity to testify before the Board. I offer the following brief comments regarding the proposed change to Faculty qualifications in 244 CMR 6.04 2(b) 4c ii(iii)(a) and have included additional comments in my written submission.

* Requiring an MSN for clinical faculty would impose undue burdens on the community college nursing programs that graduate nearly 4000 nurses every year and may well cause a reduction in the number of nurses we are able to graduate.
* We are already struggling with nursing faculty shortages, particularly in specialty areas such as pediatrics, maternity, and mental health, and increasing barriers to participation and raising program costs will only exacerbate our difficulties.
* We are the largest supplier of nurses who are diverse in race/ethnicity, and in gender. If the Board is serious about providing the best possible care, diversity and equity matter, and allowing BSN-prepared skills faculty to teach in the field is critical to maintaining this pipeline of diverse nurses.

Thank- you for the opportunity to provide public comment on these critical issues.

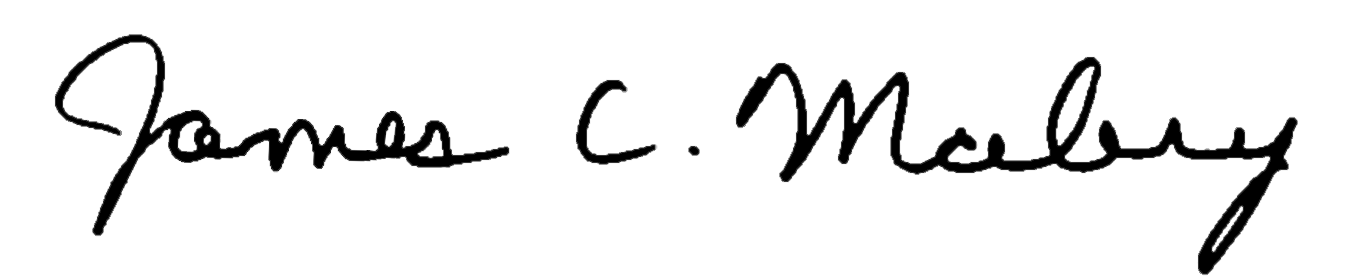
**Additional Points:**

* Concern regarding the proposed change to Faculty qualifications in 244 CMR 6.04 2(b) 4c ii(iii)(a), specifically:

“faculty appointed to a Registered Nursing program, teaching the clinical or skills lab component of a nursing course, shall possess an earned baccalaureate degree in nursing, possess a minimum of five years full-time Registered Nurse experience within the last eight years **and have been appointed before [effective date of regulation]**”

* Request that the proposed language requiring appointment before effective date of regulation be removed from the proposed regulations.
* Although this change does grandfather in faculty who are already appointed, this proposed change would eliminate the option to hire new part time faculty who are experienced to teach in the clinical or laboratory setting but have a BSN and not a master’s degree.
* This is particularly relevant in specialized areas such as pediatrics, maternity, and mental health nursing.
* Although hiring master’s prepared faculty is always the preferred option, we are facing a significant nursing faculty shortage in our state and region. This is well documented in research and publications (Massachusetts Action Coalition1,2,3). This shortage is due in part to the inequity in pay between academia and practice.
* It is increasingly difficult to fill full-time faculty positions with MSN prepared faculty, which often results in failed searches or searches with only one qualified candidate.
* Currently we have multiple unfilled full-time positions across the community college system, which necessitates the additional use of part-time faculty. Less populated areas of the state will be disproportionally impacted, as they have even fewer potential faculty candidates to draw on.
* Massachusetts nursing 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.
* If this language is not removed from the proposed regulations, many Massachusetts nursing programs will be unable to maintain our current enrollment of students, and we will no longer be able to graduate the number of new nurses to meet the current and future workforce needs
* Community College nursing programs serve an increasingly diverse student population that contributes to a diverse nursing workforce. For example, since 2015 the percentage of diverse students in the Middlesex Community College nursing program has increased from 27.6% to 34.4%.
* Having the ability to hire BSN prepared part time faculty allows us to build on their clinical expertise and mentor them in the educator role. It is not unusual for these faculty to discover a passion for teaching and seek to continue their education.

Sincerely,



James Mabry, Ph.D.

President