Proposed Changes to CMR 244 6.0

Karyn Skiathitis

Wed 10/28/2020 10:54 AM

**To:** DPH-Testimony, Reg (DPH);

**Cc:** Robson, Hansella (DPH); Hillson, Laurie (DPH);

|  |
| --- |
| [Greenfield ~.pdf](https://email.state.ma.us/owa/RTestimony@MassMail.State.MA.US/service.svc/s/GetFileAttachment?id=AAMkADY4ZTBmOGU1LWNlNTAtNDM0NC1iYTE4LTk1MzUwM2I3MDI0NQBGAAAAAACGx4d%2BnetvSZP51JqJyX7CBwD7vLJDp%2Bv3S7DtzgFG2Hr4AAOAMBBrAAD7vLJDp%2Bv3S7DtzgFG2Hr4AAOsBdGJAAABEgAQAOQ2uCHqGm9HqnmOs8CNhoQ%3D&X-OWA-CANARY=TpOjwGzVb0GtnFz4GBL2usXFYHtFf9gI0c3v7OTaGvtAy7YYEuFWhZIf9n7LdUSCoNYYaapVpmY.) |

To The Massachusetts Board of Registered Nursing;

I am writing to express my opposition to the proposed change to the regulation CMR244 6.0 that removes the option of Waiver #3 for adjunct faculty members. Changing Section 3.4 to language which excludes the possibility of hiring baccalaureate-degree nurses with five years of experience creates an existential threat to our program as we have far fewer graduate degree nurses available for employment in the Connecticut River Valley and Pioneer Valley, and those that here are rarely interested in part-time adjunct positions. While I appreciate the BORN’s efforts to elevate nursing and nursing education, leaving us without options when hiring adjunct faculty may threaten the ability of our program to provide the valuable and effective clinical opportunities to our students.

Additionally, I am opposed to any measure that would put the accreditation candidacy date for our Practical Nursing Certificate Program at any date prior to December 31, 2022 and the initial date for accreditation prior to December 31, 2025. Due to the COVID-19, our college has experienced a decrease in enrollment which did not impact our nursing programs but did alter our college finances. Additionally, as a new administrator I am dedicated to the concept of accrediting our PNC program, but am working to get on board and begin the accreditation process which was not initiated prior to my arrival. Keeping the original timeline would allow for adequate time for our program to prepare for this next step and provide the support necessary from the BORN for our programs to create an important and valuable framework for this transition.

Attached is the letter from the President of Greenfield Community College, Dr. Yves Saloman-Fernandez expressing her opposition to the change in CMR 244 6.0 3.4 and pushing dates for PN Accreditation up to any date earlier than those recommended above

Thank you for this opportunity to submit testimony. It is my hope that the Board will consider all of the testimonies submitted by programs across the Commonwealth before finalizing this very important and impactful decision.

Respectfully Submitted,

Karyn Skiathitis MSN RN CPN

Assistant Dean of Nursing

Greenfield Community College

[skiathitisk@gcc.mass.edu](mailto:skiathitisk@gcc.mass.edu)

413 775 1758

E120