October 23, 2020

To the Massachusetts Board of Registration in Nursing:

As the Superintendent of the Upper Cape Cod Regional Vocational-Technical School District I would like to submit the following comments regarding *244 CMR 6.00 Approval of Nursing Education Programs, Standards and Procedures* on behalf of the Upper Cape Cod Regional Technical School practical nursing program.

I strongly endorse the language at *244 CMR 6.04(2) (c) Preceptors*. The faculty of our practical nursing program looks forward to having this method of nursing education instruction available for our students, especially considering the current pandemic as it will offer another avenue to obtain clinical hours. The preceptorship will also facilitate the transition of our student nurses to practitioner and is a common practice among medical and dental health programs.

I am also looking forward to the elimination of the minimum program length and minimum clock hours as proposed in *244 CMR 6.04(4)(b)*. Delivering the curriculum to achieve program outcomes with more flexibility will allow the PN program the opportunity to increase their utilization of evidence-based teaching methods and practices. This will also 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 currently are approximately 16 practical nurse programs in the Commonwealth that do not have accreditation by a Board recognized accrediting agency in nursing nor are they in accreditation candidacy status. The deadlines as currently proposed are not attainable; specifically, the December 31, 2020 date to obtain candidacy. The majority of the practical nursing programs in the vocational schools in the Commonwealth are accredited by the Council on Occupational Education, COE, a nationally renowned accrediting organization that accredits countless institutions with nursing programs across the country providing Title IV accreditation standards as approved by the United States Department of Education. The cost of this endeavor has not been included in our budget for Fiscal Year 20/21 which has already been submitted and approved by the Upper Cape Cod Regional Vocational-Technical School Committee. The reality of loss of state and local funding and a redirection of resources to the COVID-19 response are major considerations for many schools. Additionally, the cost of obtaining accreditation (approximately $12,000.00-$15,000.00) will need to be included in future budget planning. As the cost of accreditation will most likely increase tuition costs, additional time is needed to evaluate budgets and identify funding sources. Many students are already experiencing financial hardships due to the pandemic. 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 our programs. As of today, tuition costs and fees have been published for the 20/21 academic year and students have been accepted. Lastly, the long-term impact of the COVID-19 is not yet fully known, however funding of the school and the PN program will certainly be adversely affected.

I request that the date for the PN program to obtain candidacy be changed to December 31, 2022 and retain the date of December 31, 2025 to obtain program accreditation. Changing the candidacy date to December 31, 2022 will provide adequate time to prepare necessary budgets and publish any changes to program costs as well as allow faculty, staff and administration the appropriate time to prepare required documentation.

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I am opposed to the insertion of an effective date to the appointment of the registered nurse clinical or skills lab faculty that has been added to *244 CMR 6.04(2)(b) 4.c.iii.(a)* [i.e. the current Waiver Option 3 that is provided in current Education Policy 02-02]. In accordance with data published in the Health Professions Data Series – Licensed Practical Nurse 2015, the Massachusetts Department of Public Health, 30.9% of LPNs reported being currently enrolled or making plans to enroll in an 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, especially in the Massachusetts Community College system, the opportunity for Upper Cape Cod Regional Technical School graduate LPNs to advance their education to RN through the Community College system will be negatively impacted.

I appreciate the opportunity to participate in this regulatory process. I am aware that there is no representation of practical nurse programs currently serving on the Board. I believe it is important that this community of educators and parent institutions be heard, and our concerns be considered when making any changes to the nursing education regulations.

Very truly yours,

Roger D. Forget

Superintendent