

To the Board of Registration in Nursing:

On behalf of the American Nurses Association Massachusetts, I would like to submit the following comments on BORN: 244 CMR 5.00 and the proposed new regulations.

1. The American Nurses Credentialing Center (ANCC), recognized nationally for accrediting continuing education providers and approvers as well as articulating standards for nursing continuing education has recently made changes to their guidelines. The changes are not reflected in the revisions proposed by the Board of Nursing. The new guidelines are as follows:
	1. Nationally the standard for calculating contact hours has changed and currently 1 contact hour = 60 minutes.
	2. The requirement for articulated objectives has been changed. The objectives have been incorporated into a statement of intended outcome that must be measureable and learner focused.

ANA Massachusetts would like to offer consultation to the BORN regarding the development of the standards being established on domestic violence and sexual violence training for registered nurses. The membership of ANA Massachusetts is broadly based across the state and all areas of registered nursing practice are represented and in addition is an accredited approver of nursing continuing education by the ANCC. It is our intention to respond to these standards and develop a training program and thus we would like to be included on the list of educational programs that will meet the training requirement.

As always, the ANA Massachusetts Board of Directors continues to welcome collaborations with the BORN for the benefit of the nurses and the public which we both serve.

Sincerely,



Cathleen Colleran-Santos DNP, RN

President, ANA Massachusetts