



Lancaster Institute for Health Education

2004 FEB 26 AM 9:01

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Original: 2383

February 17, 2004

Martha Brown, Counsel
PA State Board of Nursing
P.O. Box 2649
Harrisburg, PA 17105-2649

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FEB 20 2004

DOS LEGAL COUNSEL

Dear Ms. Brown,

I am writing in response to the proposed rulemaking published in the *Pennsylvania Bulletin* of February 14, 2004 specific to (16A-5118) Programs in Transition. As the Director of the Lancaster Institute for Health Education (LIHE), I represent the nursing program that first brought to the attention of the State Board of Nursing the problems associated with the current language of its rules and regulations as it relates to programs in transition.

After careful review of the proposed changes to the regulations, I find these changes to be both realistic and reasonable. In addition, the described activities to monitor these programs will continue to protect the quality of educational curricula within our Commonwealth and to ensure public welfare and safety.

I commend the State Board for the steps taken to increase the flexibility for hospital-based diploma programs to transition to degree-granting programs.

On behalf of the Administration, Faculty, Staff and students at LIHE, I thank the State Board for its endeavors on behalf of hospital-based schools and am hopeful that such response by the Board will continue should other timely issues surface.

Sincerely,

Mary Grace Simcox, EdD, RN
Director

Lancaster Institute For Health Education

410 North Lime Street • Lancaster, PA 17602

(717) 544-4912 • 800-622-5443 • Fax (717) 544-5970 • www.lihe.org



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF NURSING
Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
(717) 783-7142

Original: 2383

February 25, 2004

The Honorable John R. McGinley, Jr., Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harristown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

Re: Public Comment: Proposed Rulemaking
State Board of Nursing
16A-5118: Approval of Diploma Programs in Transition to Degree-Granting Status

Dear Chairman McGinley:

Pursuant to Section 5(c) of the Regulatory Review Act (71 P.S. § 745.5(c)), enclosed is a copy of a written comment received by the State Board of Nursing regarding regulation 16A-5118.

Sincerely,

Janet Hunter Shields, MSN, CRNP, CS

Janet Hunter Shields, MSN, CRNP, CS, Chairperson
State Board of Nursing

JHS/MHB:kmh
Enclosure

cc: Joyce McKeever, Deputy Chief Counsel
Department of State
Ann W. Steffanic, Board Administrator
State Board of Nursing

POMA



PENNSYLVANIA
OSTEOPATHIC
MEDICAL
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*A divisional society of the American
Osteopathic Association*

February 23, 2004

Martha Brown, Counsel
State Board of Nursing
P.O. Box 2649
Harrisburg, PA 17105-2649

Original: 2383

Dear Ms. Brown:

We have reviewed the proposed rulemaking under the State Board of Nursing regarding Programs in Transition.

We have one comment under 21.51 (a), which states:

- (a) A nursing program shall be developed under the authority of a regionally accredited university or college, or hospital approved by the Joint Commission on Accreditation of Hospitals (JCAHO), and under the leadership of a registered nurse...

We believe that hospital programs accredited by the American Osteopathic Association's Healthcare Facilities Accreditation Program should also be included. The Healthcare Facilities Accreditation Program (HFAP) is similar to JCAHO, as these are the only two programs approved by the federal government for hospital accreditation.

Institutions accredited by JCAHO are eligible to apply for accreditation through the HFAP. Therefore, it is important that institutions accredited by HFAP be included as a base for nursing programs. Also, we have two colleges of osteopathic medicine in Pennsylvania who can qualify to develop a nursing program.

We would appreciate your inclusion of HFAP in the rulemaking.

Thank you,

Domenick N. Ronco, D.O.
President

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FEB 25 2004

DOS LEGAL COUNSEL



THE HOSPITAL & HEALTHSYSTEM ASSOCIATION OF PENNSYLVANIA

2004 MAR 22 AM 9:40

March 12, 2004

Martha Brown
Counsel
State Board of Nursing
P.O. Box 2649
Harrisburg, PA 17105-2649

Original: 2383

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MAR 16 2004

RE: Programs in Transition (16A-5118)

DOS LEGAL COUNSEL

Dear Ms. Brown:

The Hospital & Healthsystem Association of Pennsylvania (HAP), on behalf of its members and their related hospital-based nursing education programs, has had an opportunity to review the proposed regulations that would allow for continued recognition of a diploma program by the State Board of Nursing during the time period that the school its changing its status to an associate or baccalaureate degree education program under the authority of a university or college pursuing regional accreditation.

HAP commented extensively on the draft version of the regulation in November 2001, and is pleased to see that the Board has incorporated all of those suggestions offered at that time. HAP fully supports the proposed regulations, as they are written, without any recommended changes to the proposed language.

However, HAP does suggest that the State Board of Nursing and the Pennsylvania Department of Education consider spelling out more specific details in order to identify potential problems with regard to communication and processing of information between the two agencies and developing guidelines to assist those schools through the process of satisfying both agencies' requirements. As an example, as written, the diploma program needs to have been maintained on full approval status for a period of 3 years prior to the transition by the Pennsylvania State Board of Nursing. What is not clear is whether this is a condition that needs to be satisfied before the program can seek initial approval status for degree-granting status from the Department of Education, and if so, what documentation will be required by the department to ensure that this requirement is satisfied by the school — a letter from the Board of Nursing to that effect or simply evidence that can be produced by the school? HAP believes that the Lancaster General College of Nursing & Health Sciences could be of great assistance in working with both agencies in reacting to such guidelines developed by both agencies having been a pioneer in this area.

HAP would then respectfully suggest that the State Board of Nursing and the Pennsylvania Department of Education consider hosting an educational session to provide greater detail for diploma schools that are interested in understanding the process

4750 Lindle Road
P.O. Box 8600
Harrisburg, PA 17105-8600
717.564.9200 Phone
717.561.5334 Fax
haponline.org

Martha Brown
March 12, 2004
Page 2

and what is involved. There are several diploma schools that would appreciate the opportunity to have that dialogue in order to help them make a determination about whether this is a route that they want to pursue.

Again, HAP appreciates the efforts made by the Board to revise its regulations to accommodate hospital-based schools of nursing interested in changing their status to that of a regionally accredited college. If you have any questions about HAP's comments, please feel free to contact Lynn G. Leighton, vice president, professional & clinical services, HAP at 717-561-5308 or by email at lgleighton@haponline.org.

Sincerely,

A handwritten signature in black ink that reads "Paula A. Bussard". The signature is written in a cursive style with a large initial 'P'.

PAULA A. BUSSARD
Senior Vice President
Policy and Regulatory Services



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BUREAU OF PROFESSIONAL AND OCCUPATIONAL AFFAIRS
STATE BOARD OF NURSING
Post Office Box 2649
Harrisburg, Pennsylvania 17105-2649
(717) 783-7142

RECEIVED
2004 MAR 11 AM 9:51
REGULATORY REVIEW COMMISSION

March 8, 2004

The Honorable John R. McGinley, Jr., Chairman
INDEPENDENT REGULATORY REVIEW COMMISSION
14th Floor, Harristown 2, 333 Market Street
Harrisburg, Pennsylvania 17101

Original: 2383

Re: Public Comment: Proposed Rulemaking
State Board of Nursing
16A-5118: Approval of Diploma Programs in Transition to Degree-Granting Status

Dear Chairman McGinley:

Pursuant to Section 5(c) of the Regulatory Review Act (71 P.S. § 745.5(c)), enclosed is a copy of a written comment received by the State Board of Nursing regarding regulation 16A-5118.

Sincerely,

Janet Hunter Shields, MSN, CRNP, CS

Janet Hunter Shields, MSN, CRNP, CS, Chairperson
State Board of Nursing

JHS/MHB:kmh
Enclosure

cc: Joyce McKeever, Deputy Chief Counsel
Department of State
Ann W. Steffanic, Board Administrator
State Board of Nursing



Office of the President
7373 Admiral Peary Highway
Cresson, PA 16630-1999

2004 MAR 11 AM 8:51

www.mtaloy.edu

(814) 886-6411
Fax (814) 886-2978

March 3, 2004

Ms. Martha Brown
Board Counsel
State Board of Nursing
Box 2649
Harrisburg, PA 17105-2649

Original: 2383

RE: Approval of Diploma Programs in Transition to Degree-Granting Status

Dear Ms. Brown:

The following comments are offered in response to the proposed rulemaking, Approval of Diploma Programs in Transition to Degree-Granting Status, as an amendment of 21.51.

Mount Aloysius College, which has offered an associate degree in nursing since 1964 and a bachelor of science in nursing since 1992, strongly supports the placement of nursing education in the context of higher education. The history of the profession of nursing is testimony to the fact that the profession gained its rightful place in the arena of professional health care providers as its practitioners obtained credentials from institutions of higher education.

There are substantive questions about the hospital-based program's capacity to provide the comprehensive education that is the hallmark of the associate or bachelor's degree in nursing. Realistically students would not be exposed to the same range of curricular and extra-curricular experiences as students in a college or university program. A college or university degree signals a breadth and depth of education that is made possible because of the convergence of a whole set of educational resources.

In this period of acute nursing shortage, there are more than enough candidates for all nursing programs. Our concerns relative to the move toward the establishment of single-standing degree-granting programs do not arise from any perceived impact such programs might have on enrollments in collegiate programs. To the contrary, we wish to express our conviction that the goal of all nursing education is to provide the best and most comprehensive educational opportunity for future nurses.

For these reasons, Mount Aloysius College recommends that diploma programs seek creative ways in which to partner **over the long term** with degree-granting institutions in order to afford their students the advantages that accrue to affiliation with such institutions. The synergy resulting from permanent affiliation is likely to lead to more positive educational outcomes for students than simply a transitional relationship with a college or university might.

Thank you for the opportunity to offer comments on this proposed rulemaking.

Sincerely,

Sr. Mary Ann Dillon, Ph.D.
President

Cc: IRRC

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MAR 05 2004

DOS LEGAL COUNSEL



Pennsylvania MEDICAL SOCIETY®

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2004 MAR 22 AM 9:40
REVIEW COMMISSION

March 15, 2004

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ROGER F. MECUM
Executive Vice President

Ms. Martha Brown
Counsel
State Board of Nursing
P.O. Box 2649
Harrisburg, PA 17105-2649

Original: 2383

Re: Approval of Diploma Programs in Transition to Degree-Granting Status;
Proposed Rulemaking (16A-5118)

Dear Ms. Brown:

I am writing as President of the Pennsylvania Medical Society to comment on the above captioned proposed rulemaking of the State Board of Nursing that appeared in the *Pennsylvania Bulletin*.

The Medical Society has no comments on the language contained in the proposed regulations and supports the principle behind the recommended changes to allow hospital-based diploma programs to transition to degree-granting status under the authority of a university or college pursuing regional accreditation.

Given the alarming shortages in qualified nurses coming into the health care delivery system, increasing the availability of more training opportunities, especially in more localized areas at community hospitals, will hopefully turn the tide and increase the nursing workforce.

Thank you for this opportunity to comment on this proposed rulemaking. By copies of this correspondence, I am advising the Independent Regulatory Review Commission and the legislative committees of the Medical Society's support for these proposed regulations.

Sincerely,

Jitendra M. Desai, MD
President

Cc: Independent Regulatory Review Commission
Chairs, Senate Consumer Protection and Professional Licensure Committee
Chairs, House Professional Licensure Committee
Pennsylvania State Nurses Association

777 East Park Drive

P.O. Box 8820

Harrisburg, PA 17105-8820

Tel: 717-558-7750

Fax: 717-558-7840

E-Mail: stat@pamedsoc.org

www.pamedsoc.org