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INDEPENDENT REGULATORY
REVIEW COMMISSION

Ann Steffanic
Board Administrator
State Board of Nursing
P.O. Box 2649
Harrisburg, PA 17105-2649

Dear Ann Steffanic:

I am writing in response to the proposed rule-making specific to "Faculty Requirements for Nursing Education Programs" published in the August 25, 2007 issue of the Pennsylvania Bulletin (volume 37, number 34). I have questions specific to the qualifications of the "clinical preceptor" (§21.71 (c)(5)). My questions are as follows:

1. What will the educational/experiential requirements be for a clinical preceptor? Will a clinical preceptor with an associate's degree or diploma in nursing be permitted to supervise baccalaureate students? What about supervision of generic master's students (those students enrolled in an entry into practice program who already hold a baccalaureate degree in another field). If nurses with the associate's or diploma in nursing are permitted to serve as "clinical preceptors" has anyone considered the message that this would convey to nursing students pursuing the baccalaureate or higher degree (i.e., "generic" master's degree) for entry into nursing practice?

I consider this scenario to be in diametric opposition to the Nursing Education Capacity Working Group's goal of expanding the supply of qualified faculty "without compromising the quality of nursing education," especially when the student has a higher level of educational attainment than their preceptor. I liken this potential scenario to the pursuit of my doctorate; I would have felt that I was not receiving "value" for my educational dollar if my professors had a bachelor's or master's degree yet attempted to educate me at the doctoral level.

2. What will be the continuing education requirement for the new "clinical associates"? Will they be required to receive some type of education/training in principles of effective instruction? If not, how will their competence be assessed/assured? A license to practice as a professional nurse does not mean that the individual will be an effective clinical instructor.

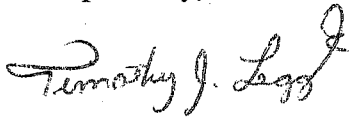
3. Will the "clinical associates" be required to have a specified number of years of experience as a Professional Nurse? In theory, a new graduate could find him/herself as a preceptor to nursing students when their own clinical skills have not been solidified.

In response to this section, I would recommend that the "clinical associate" be prepared at the baccalaureate level and be required to have at least two years of clinical experience in the area in which they will be supervising.

4. What will be the number of students that a "clinical preceptor" can supervise?
5. Will the faculty member who shall "retain responsibility for planning and evaluating student learning experiences" be required to be physically present during the clinical experience?
6. How does the board envision the process of selection of clinical preceptors? In this section it states "that faculty shall...also have input into the selection of preceptors." Will the healthcare organization select preceptors? The academic institution? Both?

I thank you in advance for your time and consideration of my questions and recommendations.

Respectfully,

A handwritten signature in cursive script that reads "Timothy J. Legg". The signature is written in dark ink and is positioned to the left of the typed name.

Timothy J. Legg