



# HACC

Central Pennsylvania's Community College

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

September 20, 2007

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

Dear Ms. Steffanic:

We are writing in response to the proposed rulemaking on Faculty Regulation for Nursing Education Programs (37Pa.B.4649).

Though we appreciate the ongoing efforts of the State Board of Nursing to maintain the highest standards for nursing education in Pennsylvania, we have concerns regarding the proposed changes. In a time of both a nursing shortage and a nursing faculty shortage we believe the new regulations will exacerbate both shortages.

One of our concerns is the requirement that faculty assistants may teach for a cumulative maximum period of five years without completing a graduate degree in nursing. Because the nursing faculty shortage is getting more acute and is expected to worsen in time, we had hoped any change to this part of the regulation would result in allowing those individuals who demonstrated consistent, quality performance as clinical educators to continue teaching in the clinical setting.

HACC graduates approximately 300 students per year with an NCLEX RN first attempt pass rate fluctuating between 94% and 97% over the last three years. Clinical education is an integral part of our program's success. If the proposed regulation would take effect, we project greater than 25% of our most experienced clinical faculty will be forced out of nursing education in Pennsylvania, resulting in a proportional, necessary, decrease in the number of students we are able to admit per year and subsequent reduction of new nursing graduates in central Pennsylvania.

A second concern we have is the large gap in minimum qualifications between the faculty assistant and the clinical preceptor. Since the faculty assistant must have a graduate degree within five years and the clinical preceptor has no educational requirements, we believe this regulation will favor programs relying more on preceptor supervised experiences. A regulation

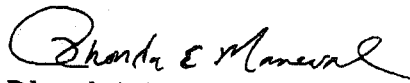
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such as this will also encourage programs to decrease instructor supervised clinical experiences in favor of preceptor supervised clinical experiences. This would, in time, lower the minimum standard for individuals charged with the direct clinical education of tomorrow's nurses in Pennsylvania.

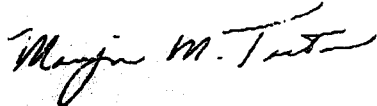
We welcome the opportunity to discuss this matter with you and the Board. Please contact any of us at the numbers below.

Thank you for considering our comments.

Sincerely,



Rhonda Maneval, RN, DEd  
Director of Nursing  
HACC-Lancaster and York Campuses  
717-358-2917



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**Gettysburg Campus**  
**Harrisburg Area Community College**

# Fax

**To:** Ann Steffanic **From:** Rhonda Maneval  
Marilyn Teeter

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**Fax:** 717-783-0822 **Date:** 9-21-07

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**Phone:** **Pages:** 3

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**Re:** Response to Proposed Rulemaking on  
Faculty Regulation for Nursing Education  
Programs

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**•Comments:**

If all fax pages are not received, please contact Karen Hamm, Nursing Education Secretary,  
at 717-337-3855 ext. 3045.