

September 24, 2007

Ann Steffanic, Board Administrator  
Pennsylvania State Board of Nursing  
Bureau of Professional and Occupational Affairs  
P.O. Box 2649  
Harrisburg, PA 17105-2649

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2007 SEP 26 PM 1:38

INDEPENDENT REGULATORY  
REVIEW COMMISSION**RE: §§21.71 and 21.72 Faculty Requirements for Nursing Education Programs**

Dear Ms. Steffanic:

The Hospital & Healthsystem Association of Pennsylvania (HAP), on behalf of its members, more than 250 acute and specialty hospitals and health systems and their related hospital-based nursing education programs, appreciates the opportunity to provide comments on the State Board of Nursing's proposed rulemaking regarding the faculty requirements for Pennsylvania's nursing education programs.

HAP appreciates the Board of Nursing's efforts to develop the most flexible and comprehensive regulations in response to the Commonwealth's need for additional nurse educators. HAP believes that the Board of Nursing has made a substantial improvement in §21.71 of the regulations, which applies the same faculty requirements to all nursing education programs and requires nurse faculty to hold at least one graduate degree in nursing. HAP believes that this revision allows for increased flexibility in the hiring of nurse educators.

HAP believes that the Board has taken great effort to ensure that the integrity and quality of Pennsylvania's nursing education system is preserved in its attempt to streamline the nursing faculty regulations, but would strongly recommend that the Board consider the following:

**§21.71(a) Minimum Faculty and Staff Requirements**

- Subsection (1) requires a full-time nurse administrator; however, it does not sufficiently outline the responsibilities of the nurse administrator, nor does it outline the need for sufficient time for the nurse administrator to devote to the operations of the nursing education program. HAP believes that nursing education programs should be able to demonstrate that the nurse administrator has sufficient time devoted to the oversight and management of the nursing education program, particularly when he or she might have similar responsibilities for other allied health education programs.
- Subsection (5) requires nursing education programs to ensure that sufficient support services are provided including administrative and clerical support services. HAP believes that additional qualifications with respect to these services would assist nursing education programs to secure appropriate levels of staffing and resources. Therefore, HAP recommends the additional amendments to the proposed regulations:
  - (5) Program support services should include the following:
    - (i) full-time secretary(ies) and administrative assistant(s) to adequately support the number of faculty and the amount of students enrolled;
    - (ii) financial aid officer(s) and admissions officer(s) to adequately support the amount of students enrolled; and

- (iii) access to librarian services either directly through the school or through a contract with another entity.

### **§21.71(c) Faculty Qualifications**

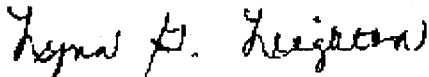
- Subsections (1) and (2) clearly outline the requirements necessary to be a faculty member or faculty assistant. However, HAP and hospital-based nursing education programs believe that the reference to “clinical nursing education courses” is confusing. In particular, it could be construed to mean that faculty assistants can only teach clinical nursing courses and not courses that do not have a clinical component. HAP believes that the Board means to include other nursing courses, including those that do not have a clinical component, such as a pharmacy and drug calculation course, a trends and issues in nursing course, or a course in nursing ethics. HAP recommends that the Board consider dropping the term “clinical” in both of these subsections and just refer to them as “nursing education courses.”
- Subsection (3) allows allied faculty members to teach basic sciences or specialized areas of nursing practice, provided that the allied faculty member has at least one graduate degree in a subject pertinent to their area of teaching. It appears that the Board believes that someone other than a master’s prepared nurse could provide instruction in specialized areas of nursing practice. This appears to contradict other proposed regulations that limit the teaching of nursing education courses to those persons with at least a graduate degree in nursing. HAP is seeking clarification regarding the circumstances envisioned by the Board as to when there might be a person other than a nurse with a graduate degree in nursing teaching a specialized area of nursing practice.
- With respect to subsections (3) and (4), HAP questions to what extent nursing education programs who do not employ allied faculty will be held accountable for ensuring that allied faculty members and faculty used to teach nutrition meet the education and licensure requirements in the regulations. Many students who enroll in hospital-based nursing education programs are expected to take non-nursing courses as pre-requisites or concurrently with their nursing education through an affiliated college or university. However, the hospital diploma program may not have much influence with regard to who the college or university assigns to teach those courses and their nursing students may be in different sections of the same course.
- HAP appreciates the Board’s interest in recognizing the use of preceptors in nursing education as referenced in subsection (5). HAP also appreciates the Board’s restraint in not developing overly prescriptive regulations regarding how preceptor programs need to be implemented. However, HAP and hospital-based nursing education programs have concerns about inappropriate overuse of preceptor experiences, including the substitution of such experiences because of the lack of sufficient numbers of nurse faculty. HAP and hospital-based nursing education programs recommend that the Board engage in dialogue with the field to develop more specific guidance with respect to the use of preceptor programs, including guidance as to the role of faculty in these kinds of experiences. Board guidance in this area should remain separate from specific regulations as HAP believes that this is an evolving area within nursing education. HAP is recommending that the Board consider implementing the following actions with respect to the use of preceptor programs by nursing education programs:

- The nursing education programs' annual report should be modified to include questions to identify where preceptor programs are being used.
- The State Board of Nursing should convene a committee that includes representatives from the state's nursing education community to craft the appropriate questions to be included in the annual report that will help to identify the trends in nursing education as to the use of preceptor services.
- The State Board of Nursing should develop a methodology to randomly evaluate nursing education programs' preceptor programs, including conducting interviews with school faculty responsible for the preceptor programs, students who participated in those programs, and those organizations where the experience was provided, including staff who served as preceptors. Random evaluations should be conducted to ensure that there was active faculty involvement in the planning and management of student experiences.
- Based on what is learned from the above, the State Board of Nursing should consider the issuance of guidelines related to the use of precepted experiences.

Again, HAP appreciates the opportunity to provide comments to the State Board of Nursing on its proposed rulemaking regarding the faculty requirements for Pennsylvania's nursing education programs.

If you have any questions about HAP's comments, please feel free to contact me at (717) 561-5308 or by email at [lgleighton@haponline.org](mailto:lgleighton@haponline.org) or Mary Marshall at (717) 561-5312 or by email at [mmarshall@haponline.org](mailto:mmarshall@haponline.org).

Sincerely,



Lynn G. Leighton  
Vice President  
Professional & Clinical Services