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INDUSTRIAL REGULATORY
REVIEW COMMISSION

I would like to take this opportunity to respond to the proposed rulemaking document developed by the State Board of Nursing. First, I would like to thank the board for their efforts to respond to the growing faculty shortage by easing the restrictions on appointments for nursing education programs.

I do have some concerns about the proposed document. In regard to use of preceptors, I believe the guidelines set forth need to be more specific in relation to faculty responsibility for planning and evaluating student learning experiences. In our program, we utilize preceptors in the capstone course. In this course we provide a preceptor workshop to prepare selected preceptors. Faculty meet with the students and preceptors several times a week on the clinical unit. There are specific assignments students must complete such as a QA project and weekly journaling of experiences. Faculty are not always on-site (during off-shifts) however, we are available by page should a problem arise. However, I have been in some clinical sites where I have seen students with preceptors who have no structure to their clinical experience. I have concerns that some nursing programs may abuse the student preceptor program at the expense of providing a quality educational experience for the students. I would like to see some more specific guidelines related to faculty responsibilities for planning and evaluating student learning experiences.

Secondly, I have some concerns about the decision to eliminate suggested minimal requirements for clerical support for programs. I believe it would be of benefit to specifically address the requirements for the Financial Aid Counselor in addition to secretarial support. Financial Aid becomes increasing complex each year and requires specialized knowledge to fulfill the role of the position. In addition, as the number of students accepted into a program

increases so does the work of the financial aid counselor. I have concerns that not listing secretarial duties separate from the Financial Aid Counselor may result in an unreasonable expectation to combine these responsibilities. I believe it would benefit nursing education programs to list the need for Financial Aid Counseling and secretarial support proportional to the size of the program.

Finally, I would like to address the addition of the verbiage "additional responsibilities for faculty and faculty assistants". Without specifying duties included, it raises the possibility of governing hospitals requiring faculty to carry out duties unrelated to student experiences, nursing education, or research for the benefit of furthering nursing education. If Faculty, faculty assistants and program administrators are required to take on undefined "additional responsibilities" this may have a detrimental impact on nursing education programs. (Currently, the NLNAC limits other duties to 10% of job requirements.)

I trust this input will be kept anonymous related to any communications with governing hospitals. Thank you for your time and consideration in this matter.

Sincerely,

Robin R. Weaver, RN, MSN, CNE