



SBON DRAFT 1/25/08

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2008 FEB -8 AM 9: 11

INDEPENDENT REGULATORY
REVIEW COMMISSION

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

Founded 1824

Jefferson Medical
College

Jefferson College of
Graduate Studies

Jefferson College of
Health Professions

Jefferson University
Physicians

Dear Ms. Steffanic:

I wish to express my support for the State Board of Nursing's proposed amendments to 49 PA. Code Ch. 21. The proposed minimum pass rates on the NCLEX-RN will serve to improve the quality of the Pennsylvania graduates from RN and PN education programs and keep pace nationally with schools of nursing across the country.

I would also like the PHENSA-SBON to consider an additional step between provisional approval and removal of approval. As I understand the proposal, with a provisional approval schools of nursing would have 2 years to correct deficiencies. If they are unable to do so within 2 years they would be subject to removal of approval. I would like to suggest an intermediary step, that is often used in other states. If a school of nursing is unsuccessful with the 2 years of correcting their deficiencies, that an additional step or "probationary approval" should be developed. The designation of "probationary approval" would prevent the school of nursing from accepting an incoming class during this 3rd year, focusing all attention on their present student body to assist them in improving their level of performance. This creates a clearer direction of what must be accomplished, and allows schools to understand and to fully realize the ramifications of not meeting the expected standards. Furthermore it protects the public and the prospective students from continuing to support an institution that fail to meet the minimum standards as set by the PA State Board of Nursing.

I would propose that the State Board of Nursing consider establishing regulations that would guide graduates who are unsuccessful in their attempts at licensure. Additional educational and clinical requirements prior to repeating the examination should be required. I believe this will provide guidance and educational and clinical support to better prepare the student for licensure and safe clinical practice.

In addition it would help to protect the public from practitioners who lack current knowledge and experience in the clinical area. What I suggest below, is an example of one type of rational, stepped guideline that could be established.

1. After two unsuccessful attempts at licensure, proof of successful completion of an NCLEX Review Course of not less than _____ hours in duration would be required.
2. After three unsuccessful attempts at licensure, proof of successful completion of a nursing review course with a clinical component of not less than _____ hours of duration would be required.
3. All graduates of approved nursing education programs be required to sit for the licensure examination within three years of completion of the program. If the three year time period is exceeded, then proof of successful completion of a nursing review course with a clinical component of not less than _____ hours of duration would be required.

Thank you for your consideration and dedicated work on behalf of the nurses and patients throughout Pennsylvania.

Sincerely,

A handwritten signature in cursive script that reads "Karen A. Papastrat". The signature is written in black ink and is positioned above the typed name.

Karen A. Papastrat RN, MSN
Assistant Dean – Junior Level
Thomas Jefferson University
School of Nursing