

Cooper, Kathy

*H2664*

**From:** Mike Wilt [MWILT@pacounties.org]  
**Sent:** Monday, February 18, 2008 9:44 AM  
**To:** asteffanic@state.pa.us  
**Cc:** IRRRC; Mike Wilt  
**Subject:** FW: Proposed Regulation #16A-5123 (#2664), Nursing Education Programs Examination Pass Rates, State Board of Nursing

TO: Ann Steffanic, Board Administrator  
 State Board of Nursing

RE: Regulation ID # 16A-5123 (#2664)

The Pennsylvania Association of County Affiliated Homes (PACAH) appreciates the opportunity to provide a few brief comments on your proposed regulation "Nursing Education Programs Examination Pass Rates". PACAH represents county and county affiliated nursing homes in Pennsylvania and is an affiliate of the County Commissioners Association of Pennsylvania.

As a whole, PACAH support the intention of the regulation as it raises the PA standard NCLEX pass rates to around the national average. Pennsylvania has been behind most states in regards to this issue as well as the CEU mandate issue for quite some time. We are raising two concerns:

- 1.) the impact of this rulemaking on PA's ability to produce licensed nurses at the rate that the industry requires/market demands. It seems that there should be additional efforts by the licensing board to ensure that nursing education programs contain those essential elements/instructional processes that would provide the necessary support to its' student population and enable passing of the NCLEX examination. Anytime you raise the bar on outcomes it should force you to simultaneously evaluate the process requirements.
  
- 2.) The proposed rulemaking states at 21.34(7)(b), "if a program is removed from the approved list, the controlling institution shall provide for the completion of the program for students currently enrolled by placing the students in an approved program". Our concern with this is the impact of this on the current student population....timeliness of getting them into another program (will they lose a semester or so between the transition because of finding a program that is able to meet the needs of the students?) and the geographical proximity of another program in relation to the program where they are currently enrolled? What about cost differences between the two programs? The regulation does not specify the actual process and considerations, if any, in this situation.

Thank you for the opportunity to comment on these proposed regulations.

Michael J. Wilt  
 Executive Director  
 PACAH

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 REVIEW COMMISSION

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