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INDEPENDENT REGULATORY  
REVIEW COMMISSION

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

Dear Ms. Steffanic;


The purpose of my letter is to submit comments regarding (16A-5123) Nursing Education Programs Examination Pass Rates. I have reviewed the proposed changes and am submitting two points for consideration.

I am in agreement with the proposal to increase the licensure passing rate requirements for nursing education program in Pennsylvania. However, I question the support provided to nursing education programs as they implement measures to meet or maintain the higher passing standard. One way the Pennsylvania Board of Nursing could support nursing education is through the identification of appropriate faculty to student ratios for clinical courses. A mandate of this nature could allow nursing education programs to hire additional qualified nursing faculty to provide clinical instruction with the ultimate goal of enhancing student achievement of program objectives, subsequent success on the licensure examination and safe clinical practice. Nursing education programs are notoriously expensive to operate. As an administrator in nursing education, I have found it extremely difficult to secure funding for additional faculty positions. When requesting additional faculty positions to support lower faculty to student ratios, it would be extremely helpful if I were able to cite the Pennsylvania Board of Nursing mandated ratios. Support of this nature would facilitate implementation of strategies known to enhance student learning, such as smaller class size.

Secondly, as part of the continuous improvement process, data is collected and reported about each cohort of nursing students at the College. This includes licensure pass rates. Data are analyzed and reported for each graduating cohort or class. If changes to the curriculum are warranted, they are implemented with the start of the new cohort. The Board proposed definition of an examination year is October 1<sup>st</sup> through September 30<sup>th</sup>. Using this definition, a program that admits student annually in the fall semester could be including students from two different cohorts in their annual report. This makes it difficult to utilize the improvement process. It seems that reporting pass rates by cohort would allow for effective use of the improvement process.

I appreciate the opportunity to comment on the proposed changes to (16A-5123) Nursing Education Programs Examination Pass Rates. Please contact me with any questions regarding these comments. I can be reached at 724-287-8711 Extension 8275.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth A. Gazza', written in a cursive style.

Elizabeth A. Gazza PhD, RN, LCCE, FACCE  
Dean of Nursing and Allied Health