

February 19, 2008

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

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INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Stefanic,

Pennsylvania State Nurses Association thanks you for the opportunity to respond to the proposed regulation Nursing Education Programs Examination Pass Rate (49PA. Code CH. 21).

Issue – Setting of new minimum pass rates of program graduates on the nurse licensing examination.

Pennsylvania State Nurses Association Response

We appreciate the work you have done to improve the standards of nursing graduates in Pennsylvania. The Pennsylvania State Nurses Association (PSNA) supports the higher pass rates for graduate registered nurses. **We support:**

- The increasing increment of pass rates over the two years following implementation of the revised regulations.
- The downgrading of nursing programs to provisional status if their pass rate falls below 80% for first time testers.
- The revision that will align Pennsylvania with other states that mandate higher standards and will motivate nursing programs that hover near marginal levels to improve themselves.

Rationale

PSNA feels that by increasing the standards of the NCLEX passing rate, we improve the quality and safety of the citizens of Pennsylvania. We also feel that this would improve the admission standards for nursing schools across Pennsylvania. The schools of nursing would need to admit candidates to their schools that appear to be prepared to pass the NCLEX exam. This change in the pass rate would also be an impetus to nursing schools to cultivate the students they admit to be successful in passing the NCLEX as well as develop their critical thinking skills.

Pennsylvania State Nurses Association also supports the institution of parallel procedures for the RN and LPN programs regarding sufficient notice of intent to remove a program. We support the Board revision that the program removed from the approved nursing program list must provide an approved plan for students affected by their current program being removed from the approved list.

Recommendation

- PSNA requests further investigation regarding the presence of any conclusive evidence to indicate that first-time successful test takers are safer practitioners than those who pass on their second attempt. This proposal appears to indicate that that the difference exists, and only first time test takers are valid indicators of a program's worth. For those who fail on their first attempt due to "freezing" during the testing experience, the need for a second attempt is not program-related, yet will negatively reflect on program outcomes. PSNA would suggest that schools rate their success on a combination of first and second test takers and develop a benchmark.

Sincerely,

A handwritten signature in cursive script, appearing to read "Betsy Snook".

Betsy Snook, Med, BSN, RN
Executive Director
Pennsylvania State Nurses Association