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TO: Julia Nelson, RN, Chairperson and Members of the State of Wisconsin Board of Nursing

FROM: Gina Dennik-Champion, MSN, RN, MSHA  
WNA Executive Director

DATE: June 13, 2013

RE: Board of Nursing Informational Public Hearing on Wisconsin Administrative Code Chapter N 1 – Program Approval for Schools of Nursing, WNA Comments

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On behalf of the Wisconsin Nurses Association, Board of Directors, I would like to thank you, Chairperson Nelson, and the members of the Wisconsin Board of Nursing for conducting an informal public hearing on Chapter N 1 – Program Approval for Schools of Nursing. My name is Gina Dennik-Champion, and I am the Executive Director of the Wisconsin Nurses Association (WNA). WNA membership is open to any RN in Wisconsin and consists of staff and advanced practice nurses, managers, CNOs, Deans and Directors of Schools of Nursing, researchers and educators.

WNA alerted our members about the purpose of your informal hearing and wanted to afford them the opportunity to share their perspectives. We hosted two conference calls and received comments from 10 participants. We also sought input from the members of our Public Policy Council.

I will now provide a summary of the comments that were made during the conference calls and Council discussion.

**Section N 1.01** – Authority and intent. We support this section as written.

**Section N 1.02** – Definitions. We would like to suggest the addition of the following terms:

Monitoring status – clarify the difference between probationary status,

Accreditation – as compared to “Regionally accredited” which is defined in N 1.02 and,

National Accreditation – as compared to “Regionally accredited”

**Section N 1.03** – Board of approval of new nursing programs. No comments.

**Section N 1.04** – Continuation of the approval of schools based on accreditation by a board recognized nursing accreditation.

There was support for requiring all schools of nursing to be accredited. The participants viewed accreditation as good for the consumer, who in this case is the nursing student. It was our understanding that graduation from a non-accredited school creates barriers to admission into other nursing programs like a BSN completion or graduate level who do require graduation from an accredited program. WNA believes that the time has come for all nursing programs to be accredited.

**Section N 1.05** - Continuation of approval of schools based on compliance with Board standards.

We recommend that if the changes were made to N 1.04, accreditation for all schools of nursing, this section could be deleted. The benefits for the consumer were stated above but there is also benefits for the board which is best stated in Chapter N 1.01 Authority and intent Section(2):

*“The intent of the board of nursing in adopting rules in this chapter is to reduce duplication that has existed between the board and national accreditation processes for nursing schools, to clarify requirements, and to develop efficient timelines for the nursing school approval process”*

WNA interprets N 1.01 (2), to mean that if accreditation were required of all schools the resources devoted to reviewing school compliance with board standards could be reallocated and used for other efforts.

**Section N 1.06** - Standards for school approval or continuing approval.

There were comments and support in N 1.06 (4) (a) in regards to requiring the experience of the education administrator to include two full years of direct care and three years of experience in nursing education within the past 10 years.

**Section N 1.07** – Changes requiring approval of the board. No comments.

**Section N 1.08** – Closure of approved school. No comments.

**Section N 1.09** - Exceptions. No comments

As WNA reviewed all of Chapter N 1 we felt that the majority of the language remains contemporary and succinct. WNA appreciates this brevity and the use supporting processes and documents to implement the rules. We find that long lists found in other states’ rules only serve to become outdated sooner which, in turn, result in having to go through the arduous rule-making process.

WNA thanks you for holding this informal hearing and affording WNA the opportunity to share our perspective. Please let me know if you have any questions or need clarification.