

May 21, 2018

Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing– Boards and Committees Section
P.O. Box 30670
Lansing, MI 48909-8170

Attention: Policy Analyst

RE: Comments Board of Nursing – General Rules (ORR 2018-033 LR)

The American Nurses Association-Michigan (ANA-MI) has review the proposed rules changes and we are submitting the following comments.

Part 1. Human Trafficking

- Suggestion that language be clear that required content on human trafficking will be included in preprofessional nursing programs - both RN and LPN.

Part 2: Licensure

- R338.10204 3. (a) Why is the verification from the College of Ontario the only exception from the CGFNS — why not other Canadian provinces other than Quebec?
- R338.10204 4 (b) suggest not including specific companies that offer NCLEX - RN review courses since they could change over time. A list of approved courses could be on the DLARA website and referenced in the rules. Additionally, what is the process for approval by the Board for a review course (d).
- R338.10207 (f) Skill competency - focus is on acute care and does not encompass full range of practice settings. Lacks evidence to support effectiveness of skill competency evaluation.

Part 3: Nursing Education Programs

- R 338.10301 Rule 301 (h) (iv)As written, it is possible for students to do their clinical experience in psychiatric/mental health nursing in settings that are not specific to psychiatric mental health. Language should be consistent with the other specialties and read “must consist of the study of nursing care for patients with an acute or chronic mental health or psychiatric disorder. Eliminate remainder of sentence.
- R338.10303 Rule 303(Xiii) C Replace the statement “the board May require a site visit” with “the board WILL require a site visit.” Rationale: Initial program approval should include a site visit and written report by the nurse consultant as part of the application process which is consistent with national accreditation guidelines.

- R338.10303c 1. Clarify the maximum amount of time simulation and observational experiences can be offered in clinical courses.
- R338.10305a Rule 305a (3) Include language consistent with national accreditation organizations regarding faculty credentials.
- R338.10309 Rule 309. (2) Describes the amount of simulation allowed in LPN courses. There is no comparable language for RN programs. What is the rationale for the difference between programs?
- R338.10310 rule 310. (d) use of term "compiled statistics" regarding NCLEX examination pass rates. Suggest clarification of that term - where do the compiled statistics come from, is there more than one source that is acceptable?

Part 4: Nurse Specialty Certification

- Refers to Clinical Specialists

Respectfully,



Carole Stacy, MSN, MA, RN
President, ANA-Michigan



Tobi Lyon Moore, MBA
Executive Director, ANA-Michigan

Ditschman, Andria (LARA)

From: BPL-BoardSupport
Sent: Monday, May 13, 2019 11:50 AM
To: Ditschman, Andria (LARA); Przybylo, Kerry (LARA)
Subject: FW: Comments on MBON Revised Rules

From: Lesley Morgan <lesley.morgan@baker.edu>
Sent: Monday, May 13, 2019 10:23 AM
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Subject: Comments on MBON Revised Rules

educated at the same or higher level as the academic program in which the student is enrolled

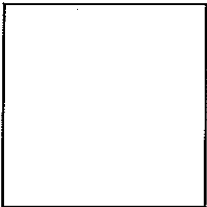
At Baker College, especially in our more remote locations of Muskegon and Cadillac the majority of the working experienced nurses are educated at the ADN level.

Baker College uses a preceptor model for the capstone course and there are not enough available BSN preceptors for the BSN students at these campuses. Until Baker College established the BSN programs in these areas 4 years ago there were only ADN programs

It is our hope that as we continue to graduate students that remain in the community the number of available BSN preceptors will increase but at this time there are not enough to support the preceptor model.

We ask that the MBON continue with the current preceptor qualifications which allow an ADN educated nurses with 5 years of experience to precept a BSN student

Thank you for the consideration



Lesley Morgan, PhD, MBA, ARNP
Dean, School of Nursing
Baker College



Ditschman, Andria (LARA)

From: BPL-BoardSupport
Sent: Wednesday, May 22, 2019 11:54 AM
To: Ditschman, Andria (LARA)
Subject: FW: rules

From: Jim Sullivan <jsullivan2207@gmail.com>
Sent: Wednesday, May 22, 2019 9:35 AM
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Subject: rules

Dear Board of Nursing:

I have a comment about the Nursing General Rules that are going to public hearing today. R 338.10303a(1)(b) seems to be missing the word report and does not match the definition in R 338.10301(l).

The rule should state: (b) The sponsoring agency shall submit a final program approval **report** to the board. The report must provide an update of the self-study that was submitted for initial approval pursuant to R 338.10303(b), review the program's progress since initial approval was granted, and include a review and evaluation of program implementation.

Sincerely,

James Sullivan

Ditschman, Andria (LARA)

From: Przybylo, Kerry (LARA)
Sent: Friday, May 10, 2019 1:04 PM
To: Ditschman, Andria (LARA); Barbara Wieszciecinski
Subject: FW: Comment for Board of Nursing General Rules

Barb,
Thank you for your comment. We will make sure to share it with the Rules Committee.
Warm regards,
Kerry

Kerry Ryan Przybylo, JD
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From: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Sent: Friday, May 10, 2019 12:59 PM
To: Przybylo, Kerry (LARA) <PrzybyloK@michigan.gov>; Ditschman, Andria (LARA) <DitschmanA@michigan.gov>
Subject: FW: Comment for Board of Nursing General Rules

I wasn't sure which one of you I should send this to?

LeAnn

From: Barbara Wieszciecinski <bwieszciecinski@midmich.edu>
Sent: Friday, May 10, 2019 12:57 PM
To: BPL-BoardSupport <BPL-BoardSupport@michigan.gov>
Subject: Comment for Board of Nursing General Rules

Dear Board,

In regard to the Nursing Rules, I am requesting a clarification of what institutes a separate educational location and what does that mean for reporting, director support, budget, etc.

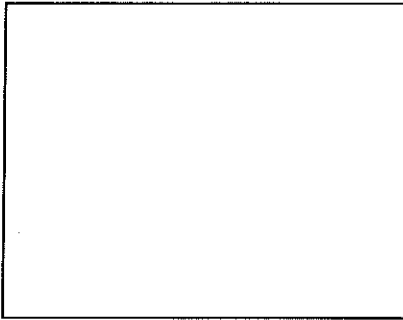
Does there need to be a full time Director of Nursing at each location? A separate budget for each location? Separate faculty?

Does this refer to a separate brick and mortar building? A separate cohort with like students? A completely different educational program (LPN vs RN)? Based on distance between locations?

Thank you.

Barb

BARBARA WIESZCIECINSKI, MSN, RN
*Dean of Health Sciences and Director of Nursing
Academic Affairs*



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