

From: [Tammy Cochell](#)
To: comms@seiu49.org; [MEEUWSEN Amanda * OSBN](#)
Subject: Re: New CNA Licensure Rules: Share Your Thoughts - Tammy Cochell
Date: Wednesday, May 15, 2024 1:19:28 AM

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New CNA Licensure Rules: Share Your Thoughts

Name Tammy Cochell

Job Title Cna 2

Where do you work? Providence

Enter any comments or questions about the pending CNA licensure rule changes here:

I think this is a terrible idea why did we spend our money to become Cna 2 and go through the training to just let all Cna 1 become altogether. Really not fair.

You can [edit this submission](#) and [view all your submissions](#) easily.

From: [Ball, Roy A :LGS VP Interim](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Division 63: Standards & Duties of CNA/CMA-Consolidation of CNA 1 and CNA 2
Date: Saturday, May 18, 2024 3:32:05 PM

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Rules Coordinator Amanda Meeuwsen,

As the current interim Chief Nursing Officer of Legacy Good Samaritan Medical Center I am submitting this letter of support for the Oregon State Board of Nursing's (Board) recommendation to consolidate the Certified Nursing Assistant (CNA) 1 and CNA 2 certifications into one certification. I support the Board in its decisions to:

- Allow individuals who have certifications as a CNA 1 or CNA 2 to continue to work at hospitals without additional requirements and;
- Allow a 12-month rollout period with flexibility to transition sooner if organizations are ready.

CNAs are valued members of our hospital and hospice care team. Their work improves the care provided to those seeking our services and enhances patient experiences. The consolidation of the CNA 1 and CNA 2 into one certification will reduce confusion and provide opportunities for advancement, early professional entry, and role clarity.

Sincerely,

Roy Ball, MS, RN

Interim Chief Nursing Officer

Legacy Good Samaritan Medical Center

Phone: 503-413-7516

E-mail: roball@lhs.org

From: [Booth, Amanda S](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Support CNA consolidation
Date: Monday, May 20, 2024 10:16:49 AM
Attachments: [image001.png](#)
[letter to OSBN.docx](#)

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Amanda Booth, MSN, RN, CCRN
Interim Nursing Director, Critical Care Division
Providence St. Vincent Medical Center
Cell: (503) 503-679-3486
Email: Amanda.booth@providence.org

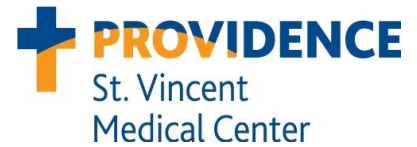


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Providence St. Vincent Medical Center
9205 S.W. Barnes Road
Portland, OR 97225
t: 503.216.1234
www.providence.org/oregon



May 20, 2024

Oregon State Board of Nursing
17938 SW Upper Boones Ferry Rd
Portland, OR 97224
Submitted electronically: amanda.meeuwsen@osbn.oregon.gov

RE: Division 63: Standards & Duties of CNA/CMA-Consolidation of CNA 1 and CNA 2

Rules Coordinator Amanda Meeuwsen,

On behalf of Oregon's 61 community hospitals, the Hospital Association of Oregon supports the Oregon State Board of Nursing's (Board) recommendation to consolidate the Certified Nursing Assistant (CNA) 1 and CNA 2 certifications into one certification. We support the Board in its decisions to (1) allow individuals who have certifications as a CNA 1 or CNA 2 to continue to work at hospitals without additional requirements and (2) allow a 12-month rollout period with flexibility to transition sooner if organizations are ready. We are aligned with the Boards' current recommendations.

CNAs are valued members of the care team at community hospitals. CNAs contribute to the health care team and work to enhance patient experiences. The consolidation of the CNA 1 and CNA 2 into one certification will reduce confusion and provide opportunities for role clarity and advancement.

We appreciated the opportunity to engage in the rulemaking process and hear the perspectives of other rulemaking advisory committee members. The staff for the board were knowledgeable and prepared. Their time and attention to this topic was greatly appreciated. This was a collaborative process.

Sincerely,

Amanda Booth

Amanda Booth
Nursing Director, Critical Care Division
Amanda.booth@providence.org

From: [Andi Easton](#)
To: [MEEUWSEN Amanda * OSBN](#)
Cc: [Carrie Norris](#)
Subject: RE: OSBN Consolidation of CNA1 and CNA2
Date: Tuesday, May 21, 2024 3:21:19 PM
Attachments: [image001.png](#)
[Final OSBN Consolidation of CNA 1 CNA 2 comment ltr 5 21 24.pdf](#)

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Ms. Meeuwsen –

Please accept the attached comment letter from Carrie Norris, on the OSBN Division 63: Standards & Duties of CNA/CMA-Consolidation of CNA 1 and CNA 2 rules.

Thank you,
Andi

Andi Easton (she/her) | Government Relations Director
Samaritan Health Services
C 503-559-1059
aeaston@samhealth.org
samhealth.org



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May 21, 2024

Oregon State Board of Nursing
17938 SW Upper Boones Ferry Rd
Portland, OR 97224

Submitted electronically: amanda.meeuwsen@osbn.oregon.gov

RE: Division 63: Standards & Duties of CNA/CMA-Consolidation of CNA 1 and CNA 2

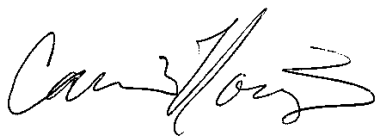
Rules Coordinator Amanda Meeuwsen,

Samaritan Health Services (SHS) recognizes that the Certified Nursing Assistants (CNAs) employed at SHS are valued members of our care team who enhance patient experiences in the Linn, Benton and Lincoln counties that we serve. We support the Oregon Board of Nursing's (Board) recommendation to consolidate the CNA 1 and CNA 2 certifications into one certification. Furthermore, we support the Board's decision to (1) allow individuals who already have their certifications to continue to work at hospitals without additional requirements and (2) allow a 12-month rollout period with flexibility to transition sooner if organizations are ready.

We appreciate the Board's thoughtful consideration of the consolidation of CNA 1 and CNA 2 into one certification that will better help to recruit CNAs from other states and prepare a workforce that meets the needs of patients in hospital settings. We are also hopeful that having one certification will reduce the barriers for potential CNAs coming into the workforce by providing greater role clarity and advancement. Once formally approved, we encourage OSBN to develop a robust communication campaign to ensure that all affected parties in Oregon are made fully aware of the consolidation plan and timeline.

SHS appreciates the opportunity to engage in the rulemaking process and hear the perspectives of other rulemaking advisory committee members. We believe the staff of the Board heard concerns and put great thought into their work. This was a collaborative process.

Sincerely,



Carrie Norris
Talent Development Strategy Program Manager-Lead
Samaritan Health Services

From: [Ivy N Jones](#)
To: [MEEUWSEN Amanda * OSBN](#)
Cc: [Amy K Fauver](#)
Subject: Division 63: Standards & Duties of CNA/CMA-Consolidation of CNA 1 and CNA 2
Date: Tuesday, May 21, 2024 2:59:01 PM
Attachments: [5-21-24 Kaiser Perm. OSBN CNA Support Letter.pdf](#)

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Amanda,

Please find attached a letter from Kaiser Permanente in support of the consolidation of CNA 1 and CNA 2.

Thank you,
Ivy Jones

Ivy Jones (She/Her)
Regulatory Consultant III

Kaiser Foundation Health Plan of the Northwest
Government Relations
500 Multnomah Street, Suit 100
Portland, OR 97232

971-359-3923 (cell)

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Thank you.

May 21, 2024

Oregon State Board of Nursing
17938 SW Upper Boones Ferry Rd
Portland, OR 97224
Submitted electronically: Amanda.meeuwsen@osbn.oregon.gov

Re: Division 63: Standards & Duties of CNA/CMA – Consolidation of CNA 1 and CNA 2

Rules Coordinator Amanda Meeuwsen,

Kaiser Foundation Health Plan of the Northwest appreciates the opportunity to provide feedback to the Oregon State Board of Nursing (OSBN) on the consolidation of Certified Nursing Assistant (CNA) 1 and CAN 2 certifications into one certification.

Kaiser Permanente Northwest is an integrated health care system that covers and cares for Oregonians. We are committed to delivering affordable, coordinated, and high-quality care and coverage that supports not only our members but also the communities we serve.

We support the Board in its decisions to (1) allow individuals who have certifications as a CNA 1 or CNA 2 to continue to work at hospitals without additional requirements while we work through consolidation and (2) allow a 12-month rollout period with flexibility to transition sooner if organizations are ready. We are aligned with the Boards' current recommendations.

CNAs are valued members of the care team at our hospitals. CNAs contribute to the health care team and work to enhance patient experiences. The consolidation of the CNA 1 and CNA 2 into one certification will reduce confusion and provide opportunities for role clarity and advancement.

Thank you for the opportunity to provide comments on this proposed regulation. We look forward to our continued collaboration throughout this rulemaking process. Please do not hesitate to contact us with questions.

Sincerely,



Kathryn Vandewalle, MSN, JD, MBA, RNC, CENP, NE-BC

Chief Nurse Executive

Kaiser Permanente
Kaiser Sunnyside Medical Center
10180 SE Sunnyside Road
Clackamas, OR 97015-9303
(503) 652-8560 (office)
(503) 583-0710 (mobile phone)

From: [Debra Love](#)
To: comms@seiu49.org; [MEEUWSEN Amanda * OSBN](#)
Subject: Re: New CNA Licensure Rules: Share Your Thoughts - Debra Love
Date: Thursday, May 9, 2024 9:14:59 AM

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New CNA Licensure Rules: Share Your Thoughts

Name Debra Love

Job Title CNA2

Where do you work? Providence Milwaukie Hospital

Enter any comments or questions about the pending CNA licensure rule changes here:

My biggest concern is for patients safety. There are skills taught Cna2 that CNA do not have. This is going to wind up with patient injury or worse. Providence has rolled out using CNA and PCT and there have been times I have caught something missed by CNA and PCT. The biggest reason they hire them is they aren't willing to pay what we are worth. I have worked in a hospital for going on 11 years and the lack of respect and amount of work has increased consistently each year. I once was asked if I knew anyone who would work here, I had to answer no one I know would do the amount of work and type of work for what they are willing to pay. CNA2 work takes a toll on you physically, emotionally, and financially. I have to have my hip replaced at the end of this month due to the years of running. Providence could care less..

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From: [Danielle Meyer](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Hosp. Assoc. Letter - CNA Consolidation
Date: Tuesday, May 21, 2024 4:51:58 PM
Attachments: [image001.png](#)
[Hosp. Assoc. Letter of Support CNA Consolidation 05-21-24.pdf](#)

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Amanda,

Please see the attached letter of support for the CNA consolidation.

Thanks,
Danielle



Danielle Meyer
Director of Public Policy
Hospital Association of Oregon
C. 610-220-1818
W. [oregonhospitals.org](https://www.oregonhospitals.org)





May 21, 2024

Oregon State Board of Nursing
17938 SW Upper Boones Ferry Rd
Portland, OR 97224

Submitted electronically: amanda.meeuwsen@osbn.oregon.gov

RE: Division 63: Standards & Duties of CNA/CMA-Consolidation of CNA 1 and CNA 2

Rules Coordinator Amanda Meeuwsen,

On behalf of Oregon's 61 community hospitals, the Hospital Association of Oregon supports the Oregon State Board of Nursing's (OSBN) recommendation to consolidate the Certified Nursing Assistant (CNA) 1 and CNA 2 certifications into one certification. We support OSBN in its decisions to (1) allow individuals who have certifications as a CNA 1 or CNA 2 to continue to work at hospitals without additional requirements and (2) allow a 12-month rollout period with flexibility to transition sooner if organizations are ready. We are aligned with OSBN's current recommendations.

CNAs are valued members of the care team at community hospitals. CNAs contribute to the health care team and work to enhance patient experiences. The consolidation of the CNA 1 and CNA 2 into one certification should reduce confusion and provide opportunities for role clarity and advancement. We request the OSBN communicate clearly and often with hospitals and offer guidance to support a smooth transition and CNAs who work in hospitals.

We appreciated the opportunity to engage in the rulemaking process and hear the perspectives of other rulemaking advisory committee members. The staff for the board were knowledgeable and prepared. Their time and attention to this topic was greatly appreciated. This was a collaborative process.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle Meyer".

Danielle Meyer
Director of Public Policy
Hospital Association of Oregon



4000 Kruse Way Place
Building 2, Suite 100
Lake Oswego, Oregon, 97035

Phone: 503.636.2204
Email: info@oregonhospitals.org
Web: oregonhospitals.org

About the Hospital Association of Oregon

Founded in 1934, the Hospital Association of Oregon (HAO) is a mission-driven, nonprofit trade association representing Oregon's 61 hospitals. Together, hospitals are the sixth largest private employer statewide, employing more than 70,000 employees. Committed to fostering a stronger, safer, more equitable Oregon where all people have access to the high-quality care they need, the hospital association supports Oregon's hospitals so they can support their communities; educates government officials and the public on the state's health landscape and works collaboratively with policymakers, community based organizations and the health care community to build consensus on and advance health care policy benefiting the state's 4 million residents.



4000 Kruse Way Place
Building 2, Suite 100
Lake Oswego, Oregon, 97035

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Email: info@oregonhospitals.org
Web: oregonhospitals.org

From: [Paxton, Elizabeth \(she/her/hers\)](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: CNA changes-letter of support
Date: Friday, May 17, 2024 3:24:17 PM
Attachments: [image001.png](#)
[CNA changes- Providence St V.docx](#)

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Thank you!!

 LP

Elizabeth L. Paxton, PhD, MSN, RN, NEA-BC
Providence St. Vincent, Chief Nursing Officer
9205 SE Barnes Road
Portland, OR 97225
O: 503.216.2320
Pronouns: she/her



Partnering with
Emily Donalson Emily.Donalson@Providence.org



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May 17, 2024

Elizabeth L. Paxton, PhD, MSN, RN, NEA-BC
CNO, Providence St. Vincent Medical Center
9205 SW Barnes Dr.
Portland, OR 97225

Submitted electronically: elizabeth.paxton@providence.org

RE: Division 63: Standards & Duties of CNA/CMA-Consolidation of CNA 1 and CNA 2

Rules Coordinator Amanda Meeuwsen,

On behalf of Oregon's 61 community hospitals, the Hospital Association of Oregon supports the Oregon State Board of Nursing's (Board) recommendation to consolidate the Certified Nursing Assistant (CNA) 1 and CNA 2 certifications into one certification. We support the Board in its decisions to (1) allow individuals who have certifications as a CNA 1 or CNA 2 to continue to work at hospitals without additional requirements and (2) allow a 12-month rollout period with flexibility to transition sooner if organizations are ready. We are aligned with the Boards' current recommendations.

CNAs are valued members of the care team at community hospitals. CNAs contribute to the health care team and work to enhance patient experiences. The consolidation of the CNA 1 and CNA 2 into one certification will reduce confusion and provide opportunities for role clarity and advancement.

We appreciated the opportunity to engage in the rulemaking process and hear the perspectives of other rulemaking advisory committee members. The staff for the board were knowledgeable and prepared. Their time and attention to this topic was greatly appreciated. This was a collaborative process.

Sincerely,

Elizabeth L. Paxton

Elizabeth Paxton, PhD, MSN, RN, NEA-BC

Providence St. Vincent Medical Center
9205 SW Barnes Road Portland, OR 97225
t: 503.216.1234
www.providence.org/oregon



From: [Lisa Rye](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Division 63 Amendment
Date: Tuesday, May 21, 2024 1:42:57 PM

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I am very excited to endorse the Division 63 amendment consolidating CNA 1 and CNA2 into a single CNA for Oregon.

As an Instructor and a Program Director at Mount Hood Community College, I have really enjoyed teaching the CNA 2 class. One of the first things I tell students when class begins is that in every other state, we call the CNA's that work in the hospitals "experienced." The additional knowledge they had learned in our programs they get with experience. The additional skills they had learned in class they can still do and learn in the workplace. Learning the skills at the workplace can potentially be safer and better for both the CNA, the workplace, and the people receiving care. In our CNA 2 programs we taught many skills that students were not able to practice in the clinical setting. They would still need additional training to be safe to perform those skills and if they were not comfortable asking or the employer did not provide the training the CNA 2 would not be adequately prepared for the task they were asked to perform.

I feel this change will improve consistency in the workplace as well as allowing CNA's additional opportunities for employment and career advancement.

Thank you for the opportunity to participate on this committee!

Lisa Rye RN
Nursing Assistant Program Director
Mount Hood Community College

From: [Woita, Ronald](#)
To: [MEEUWSEN Amanda * OSBN](#)
Cc: [Danielle Meyer](#)
Subject: Sky Lakes Letter Supporting CNA consolidation
Date: Monday, May 20, 2024 12:15:57 PM
Attachments: [HOA CNA Letter 5 20 24.pdf](#)

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Dear Amanda Meeuwssen,

Please see the attached letter in support of the OSBN's consideration for consolidation of the CNA certifications. Should any additional question please feel free to reach out.

Thank You,

Ron

Ronald J. Woita, MBA HM, BSN, RN
Chief Nursing Officer /Chief Operating Officer
Vice President
ronald.woita@skylakes.org
Ph 541 274 6150

Sky Lakes Medical Center
2865 Daggett Avenue
Klamath Fall, OR 97601



2865 Daggett Avenue
Klamath Falls, OR 97601
Ph 541 882 6311
Fx 541 274 6725
skylakes.org

David A. Cauble
President & CEO

May 20, 2024

Oregon State Board of Nursing
17938 SW Upper Boones Ferry Rd
Portland, OR 97224
Submitted electronically: amanda.meeuwsen@osbn.oregon.gov

Dear Members of the Oregon State Board of Nursing,

On behalf of Sky Lakes Medical Center, a sole community hospital in Klamath Falls, Oregon, we would like to express our support for the Board's recommendation to consolidate the Certified Nursing Assistant (CNA) 1 and CNA 2 certifications into one certification.

We commend the Board's decisions to (1) allow individuals who currently hold certifications as either a CNA 1 or CNA 2 to continue working in hospitals without additional requirements and (2) provide a 12-month rollout period with flexibility for organizations to transition sooner if they are ready. These steps align with our goals at Sky Lakes Medical Center to ensure a smooth and efficient transition for our staff and patients.

CNAs are integral members of our care team, and their contributions significantly enhance patient experiences and outcomes at Sky Lakes Medical Center. By consolidating the CNA 1 and CNA 2 certifications, we anticipate a reduction in confusion and the creation of clearer pathways for role development and career advancement. This change will support our mission to deliver exceptional patient care through a well-defined and skilled workforce.

Thank you for considering our input and for your ongoing commitment to improving the standards and practices of nursing care in our state.

Sincerely,

Ronald J. Woita RN
Chief Nursing Officer/ Chief Operation Officer
Sky Lakes Medical Center
2865 Daggett Avenue
Klamath Falls, OR 97601

From: [Elaine B. Wulff](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Letter of Support for CNA Consolidation
Date: Monday, May 20, 2024 9:21:38 AM
Attachments: [attachment-2.png](#)
[Letter of Support.pdf](#)

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Please see attached letter. Thank you.

Elaine Wulff CNO

Harney District Hospital
557 W. Washington Street
Burns, Oregon 97720
(541) 573-8608

"We are guests in the lives of our patients." Don Berwick, founder of IHI



=====

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Harney District Hospital

To be the Healthcare Partner of choice for our Community

May 20, 2024

Oregon State Board of Nursing
17938 SW Upper Boones Ferry Rd
Portland, OR 97224

Submitted electronically to: amanda.meeuwsen@osbn.oregon.gov

RE: Division 63: Standards & Duties of CNA/CMA-Consolidation of CNA 1 and CNA 2

Rules Coordinator Amanda Meeuwsen,

On behalf of Oregon's 61 community hospitals, Harney District Hospital supports the Oregon State Board of Nursing's (Board) recommendation to consolidate the Certified Nursing Assistant (CNA) 1 and CNA 2 certifications into one certification. We support the Board in its decisions to (1) allow individuals who have certifications as a CNA 1 or CNA 2 to continue to work at hospitals without additional requirements, (2) allow hospitals to provide the additional training of skills to CNAs as it would be listed in the rule, and (3) allow a 12-month rollout period with flexibility to transition sooner if organizations are ready. We are aligned with the Boards' current recommendations.

CNAs are valued members of the care team. CNAs contribute to the health care team and work to enhance patient experiences. The consolidation of the CNA 1 and CNA 2 into one certification will reduce confusion and provide opportunities for role clarity and advancement. In addition it will help small hospitals like ours in having consistency in the level of care our CNAs may provide. It will also decrease the burden for our CNAs to have to pay for a CNA2 course, avoid the distance to travel after finding a course, and avoid the stress on their families with having to make arrangements because of the length of time they will be away to complete a course.

We appreciate your consideration of the matter and appreciate the collaborative efforts made.

Sincerely,



Elaine Wulff RN
Chief Nursing Officer
Harney District Hospital
(541) 573-8608
ewulff@harneydh.com

From: [Albers, Melissa.](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Repeal OSBN administrative requirements for nursing student clinical experiences
Date: Tuesday, May 21, 2024 1:10:09 PM
Attachments: [OSBN Appeal administrative requirements for nursing students.pdf](#)

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To Whom It May Concern,

My name is Melissa, and I am a Doctor of Nursing Practice prepared Certified Registered Nurse Anesthetist and I am also a post-master's student pursuing my Psychiatric Mental Health Nurse Practitioner. I have a clinical experience planned in Oregon in the coming months and I would like to share why repealing the administrative requirements for clinical education in Oregon is so important to me and many of my colleagues.

First, Oregon has a unique culture and approach to healthcare that can't be found anywhere else in the United States. I knew that I wanted to include that experience in my practice and I actively pursued a clinical experience in Oregon. However, it took a fair amount of extra paperwork and approvals to get my clinical rotation approved. By allowing nursing students from other states to complete their clinical rotations in Oregon without completing excessive paperwork, you offer us the chance to broaden our education and perspectives. It's not just about learning new nursing or medical practices—it's about embracing a holistic and patient-centered approach that is truly special in Oregon.

The Oregon nursing community values collaboration, respect, diversity, and the power of individual choice in ways that will deeply influence my own practice. Imagine how powerful it would be if more students could bring these values back to their home states. We could help spread Oregon's positive nursing culture far and wide, making a significant difference in the quality of care across the country.

Additionally, by repealing the administrative requirements for nursing students to have clinical experiences in Oregon, it will attract more nurses into the Oregon workforce once they are exposed to the unique nursing culture. I have already fallen in love with Oregon and the idea of being able to work there and care for your wonderful community is already appealing to me. The exposure to the local job market and the connections I intend to make during my clinical experience will be invaluable in helping me set up a practice in Oregon. If more students had this opportunity, I'm sure many would feel the same way and consider staying to build their careers in your beautiful state.

In short, repealing these administrative barriers is beneficial to all. It enriches our education as nurses, spreads Oregon's exceptional nursing culture, and helps recruit passionate nurses to

the state to enhance care for Oregon residents. I ask you to make it easier for students like me to experience all the wonderful things Oregon has to offer and repeal the excess administrative paperwork for non-Oregon residents to be able to have clinical experiences more easily.

Thank you for considering my perspective and please feel free to contact me with any questions.

Melissa Albers, DNP, CRNA
PMHNP Student

May 21, 2024

To Whom It May Concern,

My name is Melissa, and I am a Doctor of Nursing Practice prepared Certified Registered Nurse Anesthetist and I am also a post-master's student pursuing my Psychiatric Mental Health Nurse Practitioner. I have a clinical experience planned in Oregon in the coming months and I would like to share why repealing the administrative requirements for clinical education in Oregon is so important to me and many of my colleagues.

First, Oregon has a unique culture and approach to healthcare that can't be found anywhere else in the United States. I knew that I wanted to include that experience in my practice and I actively pursued a clinical experience in Oregon. However, it took a fair amount of extra paperwork and approvals to get my clinical rotation approved. By allowing nursing students from other states to complete their clinical rotations in Oregon without completing excessive paperwork, you offer us the chance to broaden our education and perspectives. It's not just about learning new nursing or medical practices—it's about embracing a holistic and patient-centered approach that is truly special in Oregon.

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In short, repealing these administrative barriers is beneficial to all. It enriches our education as nurses, spreads Oregon's exceptional nursing culture, and helps recruit passionate nurses to the state to enhance care for Oregon residents. I ask you to make it easier for students like me to experience all the wonderful things Oregon has to offer and repeal the excess administrative paperwork for non-Oregon residents to be able to have clinical experiences more easily.

Thank you for considering my perspective and please feel free to contact me with any questions.

Melissa Albers

Melissa Albers, DNP, CRNA, student PMHNP

From: [Jennifer Billingsley](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: 0060 – Clinical practicum in Oregon for APRN students
Date: Monday, May 20, 2024 3:16:57 PM
Attachments: [OSBN Statement.pdf](#)

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Greetings Ms. Meeuwsen,

Please see our attached letter in support of repealing the rules related to online advanced practice nursing education requirements in Oregon within the Standards for Approval of APRN Education Programs.

Thank you
Dr. Billingsley



Jennifer K. Billingsley, DNP, FNP-BC,CNE

Dean and Professor, CONHS

p: (602) 885-2495
United States University

404 Camino Del Rio S, Suite 102, San Diego, CA
92108

www.usuniversity.edu





May 20, 2024

Re: Division 51: (0060 – Clinical practicum in Oregon for APRN students enrolled in a non-Oregon based graduate program)

To Whom it May Concern:

United States University is honored to have the opportunity to have our voice heard regarding repealing Division 51: (0060 – Clinical practicum in Oregon for APRN students enrolled in a non-Oregon based graduate program). Currently, we carefully and tediously track the Oregon requirements for clinical both for prospective students and current USU students. The limitations set forth in the current rule places restrictions on the increased capacity of the University to accept OSBN candidates now and in the future. We are in agreement that the current requirements have tremendous potential to delay clinical practicum experiences in Oregon for students or those seeking to enroll in Advanced Practice Registered Nursing degree. In light of the rigorous accreditation requirements and rules for national board eligibility, we are compelled to agree with the stance that the removal of these rules will not impact public safety negatively, and conversely, will support institutions of higher learning in supporting a response to the deepening shortage of Advanced Practice Registered Nurses.

Sincerely,

A handwritten signature in cursive script that reads 'Jennifer Billingsley'.

Jennifer Billingsley, DNP, FNP-BC, CNE
Dean, College of Nursing and Health Sciences
United States University
404 Camino Del Rio S, Suite 102
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(602) 885-2495
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From: [Cameron, Joseph](#)
To: [MEEUWSEN Amanda * OSBN](#)
Cc: [Cameron, Joseph](#)
Subject: Oregon State Clinicals
Date: Tuesday, May 21, 2024 2:58:49 PM
Attachments: [image001.png](#)

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Name: Dr. Joseph Cameron

Position: Dean of the School of Health Professions

University Affiliation: University of Providence, Great Falls, Montana

Subject: Written Testimony on Eliminating Paperwork Requirements for Out-of-State Students in Oregon's Clinicals

Introduction

My name is Dr. Joseph Cameron, and I am writing to express my views on the proposal reviewed by the Oregon State Board of Nursing (OSBN) regarding the requirement of completing paperwork for out-of-state students in Oregon State's clinicals. As the Dean of the School of Health Professions at the University of Providence located in Great Falls, Montana, I am grateful for the opportunity to address this issue and advocate for the elimination of these paperwork requirements.

Impact on Small Schools

The imposition of paperwork requirements on out-of-state students in Oregon State's clinicals has had a profound impact on our institution. As a small school, we are particularly sensitive to the challenges that these additional administrative burdens present. The resources required for students and staff to complete the paperwork are substantial, diverting attention and resources away from our core mission of serving the underserved by providing quality education.

Detrimental Effects on Students and preceptors

The paperwork requirements imposed on out-of-state students have had detrimental effects on both students and preceptors. The additional paperwork and documentation required add unnecessary complexity to the clinical learning experience, making it more time-consuming and resource intensive. As a result, students may miss out on valuable learning opportunities and preceptors may face challenges in ensuring that students receive the necessary support and guidance.

Proposed Elimination

In light of the detrimental effects that these paperwork requirements have on our institution and the learning experience for our students and preceptors, I advocate their complete elimination. By removing these administrative burdens, we can focus our efforts on delivering quality education and ensuring that all students, regardless of their residency status, receive the same opportunities and resources.

Conclusion

In conclusion, I wholeheartedly support the elimination of paperwork requirements for out-of-state students in Oregon State's clinicals. These requirements have imposed significant challenges and burdens on our institution, as well as negatively impacting students and preceptors. By removing these barriers, we can ensure that students receive the best education and that preceptors have the necessary time and resources to provide guidance and support.

Thank you for your attention to this matter, Dr. Meeuwsen.

Sincerely,

Dr. Joseph Cameron

Dr. Joseph A. Cameron, Jr.
Dean of School of Health Professions
Professor of Health Sciences
University of Providence

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From: [Michele Ellis](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Testimony re: Division 51 rule hearing
Date: Monday, May 20, 2024 7:26:59 PM

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Hello,

I am writing from Loyola University New Orleans in support of repealing the administrative requirements for out-of-state graduate nursing programs. The OSBN has always been very easy to work with, and very helpful in understanding the requirements. However, reducing the need to file the same forms every semester will reduce workload on all of us. It just takes a lot of time to contact each preceptor, get required signatures, and follow up on everything. If a school maintains accreditation, that should serve as validation that the school is appropriately preparing both students and preceptors for clinical practica.

I appreciate the opportunity to express my support for this rule repeal.

Thank you,
Michele Ellis

D. Michele Ellis, PhD, RN
Accreditation Coordinator & IRB Co-Chair
Loyola University New Orleans School of Nursing
6363 St. Charles Ave., New Orleans, LA 70118
(She/Her/Hers) [What is this?](#)

Diversity is being invited to the party.

Inclusion is being asked to dance.

From: [gradclinicals](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Division 51 ruling
Date: Tuesday, May 21, 2024 5:38:46 AM

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As a graduate clinical coordinator for a school with students around the globe, Oregon stands out as the only place where I must apply for students to participate in clinical placements. While the paperwork involved isn't particularly challenging, it is quite time-consuming. Considering that other regions have successfully implemented systems that do not require such extensive documentation, it would be highly beneficial if Oregon could streamline or eliminate these requirements as well.

Thank you!

Jennifer Fisher MSN, APRN, CNM, FNP-C
Graduate Clinical Coordinator
Associate Professor
Southern Adventist University School of Nursing
Phone: 423-236-2407
Fax: 423-236-1957

From: [Eileen Frazier](#)
To: [MEEUWSEN Amanda * OSBN](#)
Cc: [Shelley Aldridge](#); [Susan Stone](#)
Subject: Support Letter - Repealing Chapter 851-051 of OSBON
Date: Tuesday, May 21, 2024 10:16:21 AM
Attachments: [Support Letter - Repealing Chapter 851-051 of OSBON.pdf](#)

You don't often get email from eileen.frazier@frontier.edu. [Learn why this is important](#)

Dear Ms. Meeuwsen,

Please find attached a letter from Dr. Stone on behalf of Frontier Nursing University. If you have any questions, please let me know.

Sincerely,

Eileen Frazier, PACE

eileen.frazier@frontier.edu

Frontier Nursing University

Executive Assistant for Dr. Joani Slager, Dean of Nursing

Chair of the Communications Committee &

Member of the Faculty/Staff Council and Continuing Education Committee

859-251-4704

2050 Lexington Road, Versailles, KY 40383

Office Hours: 8a - 4:30p (EST)

Have*")

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(. . ' (. . ' * a Blessed Day!

~*~*~*~*~*~*~

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05/21/2024

Dear Ms. Meeuwsen,

I am reaching out on behalf of Frontier Nursing University (FNU) to express our support for repealing Chapter 851-051 of the Oregon State Board of Nursing Nurse Practice Act & Rules. We believe that the current reporting requirements pose significant obstacles for FNU's nurse-midwifery and nurse practitioner students in completing their clinical requirements.

As a nationally accredited graduate program committed to producing future healthcare leaders, we understand the importance of upholding high standards to ensure quality and safety. However, FNU has robust policies and procedures in place to ensure that our students receive appropriate clinical training in a safe environment.

The existing online APRN program requirements cause substantial delays in students' clinical practicum. FNU has a well-established process for locating and credentialing student clinical sites across the United States. We provide support through Clinical Advisors and Faculty to assist students in identifying suitable sites in their area. Our Clinical Credentialing Services meticulously vet clinical sites and preceptors, ensuring they meet rigorous standards before students commence their practicum.

However, the process of locating and credentialing clinical sites is arduous and time-consuming. Many students cite this as the most stressful aspect of their graduate experience. Requiring OSBN approval before students can begin clinical practice further extends their timelines, particularly in Oregon, where students often encounter delays, especially when faced with unexpected site changes. FNU students typically utilize 3-5 different sites to fulfill their clinical practicum requirements, necessitating OSBN approval for each site entry. These delays not only impact students but also incur additional costs for both the students and FNU.

We believe that removing the OSBN online APRN requirements will eliminate unnecessary barriers for Oregon's future healthcare providers without compromising the quality and integrity of our students' education. Thank you for considering our request. I am more than willing to engage in any discussions to reassess these requirements.

Sincerely,

Susan E Stone, DNSc, CNM, FACNM, FAAN
President

From: [Heriford, Michelle L.](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Comment regarding Repeal of 851-051-0060
Date: Tuesday, May 21, 2024 1:42:55 PM

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Hi Amanda,

Thank you for the invitation to attend the hearing.

Spring Arbor University is happy to serve students in the state of OR. We have a focus on adult learners and in a format that is online with accelerated 7 week classes, one class at a time. This appeals greatly to the working adult. We have a rigorous program and are fully accredited with the Higher Learning Committee and CCNE.

I fully support reducing unnecessary barriers for students and am therefore in favor of the repeal of OSBN 851-051-0060. But if I could choose which rule to repeal, it would be the site visit rule. We have processes in place, that are fully compliant with NONPF and approved by the CCNE, that review clinical sites for approval and evaluation of the site and preceptor after the rotation. Therefore, the site visit is an extra barrier that places financial strain on our small university. We have actually stopped accepting students from the state of OR specifically due to the site visit barrier. Some students in neighboring states have found a great clinical opportunity in the state of OR that I have denied due to the site visit requirement. I am happy to submit paperwork, but the site visit is our largest barrier.

Thank you again for taking the time to review my comment. I hope it is helpful in the decision making process.

Take care.

Michelle Heriford DNP, NP-C
Director of Nurse Practitioner Programs
School of Nursing and Health Sciences
106 E Main Street
Spring Arbor, MI 49283
Michelle.Heriford@arbor.edu

From: [Hilman, Bethany D.](#)
To: [WICKENHAGEN Sarah * OSBN](#)
Cc: [RITTER Brandy * OSBN](#); [MEEUWSEN Amanda * OSBN](#)
Subject: Re: Clinical placements
Date: Tuesday, May 21, 2024 2:53:29 PM

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Thank you so much for considering my professional input. I really appreciate it. What is the timeline for finding out if it has been repealed?

Thank you again for your time!

Warmly,
Bethany

Bethany Hilman, BSN, RN
ID # 365166
MSN PMH W055

From: WICKENHAGEN Sarah * OSBN <Sarah.Wickenhagen@osbn.oregon.gov>
Sent: Tuesday, May 21, 2024 9:39:30 AM
To: Hilman, Bethany D. <Bethany.Hilman@arbor.edu>
Cc: RITTER Brandy * OSBN <Brandy.RITTER@osbn.oregon.gov>; MEEUWSEN Amanda * OSBN <Amanda.Meeuwesen@osbn.oregon.gov>
Subject: RE: Clinical placements

[This email is from outside SAU]

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Thank you for your comments Bethany. I have included our rules coordinators, and your written testimony will be included for our rule hearing.

Best,

Sarah Wickenhagen, DNP, APRN, FNP-C (she/her/hers)

Legislative & Policy Analyst
APRN Education and Practice
Oregon State Board of Nursing
Office: 971.413.0162 | Email: sarah.wickenhagen@osbn.oregon.gov



Helpful OSBN APRN links:

[FAQ Page](#)

[Scope of Practice Question?](#)

[Oregon Nurse Practice Act](#)

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From: Hilman, Bethany D. <Bethany.Hilman@arbor.edu>

Sent: Tuesday, May 21, 2024 8:04 AM

To: WICKENHAGEN Sarah * OSBN <Sarah.Wickenhagen@osbn.oregon.gov>

Subject: Clinical placements

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Hello Sarah,

I am currently enrolled in a Psychiatric Mental Health Nurse Practitioner program through Spring Arbor University in Michigan. I have been a nurse at OHSU for 20 years and I would like to advance my career and help those individuals struggling with mental health disorders. There are no programs in Oregon that I am able to enroll in.

Please move to repeal the requirements for onsite visits for clinical sites. This will be very difficult and require a lot of extra money to help pay for an Oregon licensed RN to fly to Oregon to view the site. I feel this should be virtual to assist students to better find good placements.

Please reach out if you have any questions.

Thank you for your time and consideration to this matter.

Warmly,

Bethany Hilman

Bethany Hilman, BSN, RN

ID # 365166

MSN PMH W055

From: [Nicole Loos-Bartlett](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: repeal of Division 51
Date: Tuesday, May 21, 2024 2:19:36 PM

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Hi Amanda,

I am the Director of the NP program at Boise State University. I am writing to you today to express my support for the repeal of Division 51 of the Nurse Practice Act. Implementation of Division 51 has increased the workload related to clinical placement significantly. Often, faculty and staff spend an exorbitant amount of hours tracking down preceptors signatures associated with the Preceptor Form. Many emails are sent requesting signatures before the form is actually completed by the preceptor.

Additionally, there has been confusion for preceptors regarding where to send the form to, which has delayed students' ability to get into their clinical site in a timely manner. In this case in particular, the preceptor snail mailed the preceptor form to the OBON and did not take a copy of it, despite clear instructions.

Clinical placement has become increasingly more difficult. Division 51 adds an extra layer of complications in reference to clinical placement and often discourages preceptors from taking students.

In order to judiciously place students into clinical rotations in a timely manner, I am in favor of repealing Division 51. Thank you for your time. Nicole

Nicole Loos-Bartlett, DNP, MSN, RN, AGACNP-BC, PNP-BC, PMHNP-BC
AGNP Program Director, Assistant Professor
Boise State University, College of Health Sciences, School of Nursing
Norco Nursing and Health Services
1910 University Dr., Boise, ID 83725-1840
(559)681-6000 cell
nicolebartlett@boisestate.edu

From: [Luttrell, Jennifer H \(School of Nursing Admin\)](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: Division 51
Date: Tuesday, May 21, 2024 2:00:54 PM

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Good afternoon:

My name is Jenny Luttrell, the Director of Accreditation and State/National Compliance for the Liberty University School of Nursing. Thank you for hosting the meeting today, and for allowing feedback regarding upcoming rules changes.

We would like to speak out in support of repealing Division 51, 851-051-0060.

While we certainly will do our due diligence to remain compliant with the rules as long as they are in effect, the required paperwork for APRN clinicals in Oregon does provide an additional burden in working to secure preceptors and setting our students up to start their clinicals in a timely fashion. Elimination of this paperwork would ease this paperwork burden on both the preceptor and the student.

In addition, the in-person site visit for faculty proves to be a tremendous financial burden to nursing programs. With the cost of airfare, hotels and daily expenses, the expense to place even one student per term in Oregon proves to be substantial. Our faculty already conduct virtual site visits with all our preceptors for APRN clinicals taking place in other states to gauge student progress throughout the course. In addition, our preceptors conduct a mid-term and end of term evaluation, rating their time with the student. These touch points have proven effective for our students in evaluating the clinical progression, efficiency, and success of the practicum experience.

Given these factors, we again express our support for the repeal of Division 51, 851-051-0060.

Have a wonderful day!

Jenny Luttrell
*Director of Accreditation and
State/National Compliance
School of Nursing*

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From: [Welch, Nichole E.](#)
To: [MEEUWSEN Amanda * OSBN](#)
Subject: OSBN NP Clinical Site Visit Rules
Date: Tuesday, May 21, 2024 4:54:11 PM

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Good afternoon,

I am writing in support of changing the rules for site visits for APRN students in Oregon. I am in support of changing the rules to allow for clinical site visits to be virtual, rather than physical. I believe this will remove some of the barriers to obtaining and retaining clinical faculty without compromising the quality of APRN education.

Thank you,

Nichole E. Welch, BSN, RN, RNFA, CNOR
Student ID 361722
MSN FNP W051
541-786-3302 (Text is acceptable)
ni457903@arbor.edu