



April 1, 2025

Robert Weinman, RN
Chair, Wisconsin Board of Nursing
Department of Safety and Professional Services
Madison, WI 53708-8935

Dear Chair Weinman,

The Wisconsin Hospital Association (WHA), and the coalition of employers of nurses joining us, appreciate the Board of Nursing's role in providing oversight and governance to the state's nurses. Nurses make up more than half of our state hospitals' workforce, and two out of every three working registered nurses work in Wisconsin hospitals and health systems. As a key employer of nurses hospitals strive to be a good partner in growing, supporting and protecting this valued and valuable segment of the health care workforce. We know our partners in nursing workplaces, government, education and at the state's nursing schools strive to do the same.

We are reaching out with an opportunity for the Board of Nursing (BON) to better align state minimum standards for nursing schools to accreditation standards, to break down barriers to individuals wanting to pursue a nursing career, and to offer experienced baccalaureate nurses (BSNs) an opportunity to pursue an expanded role in education.

Our proposal is aligned to a recommendation to Governor Evers by his 2024 Task Force on the Health Care Workforce led by Lieutenant Governor Sara Rodriguez. Recommendation 8.d. in their [advisory action plan](#) suggests revising faculty educational requirements. The supporting documentation for this recommendation notes "flexibility is provided on interpretation of qualifications for faculty in accreditation models".

Three national bodies offer the accreditation the Board of Nursing requires for nursing schools, and each have standards guiding the use of BSNs as faculty.

The Commission on Collegiate Nursing Education (CCNE) provides accreditation for schools offering baccalaureate, graduate and post-graduate degrees. CCNE includes in their 2024 [Standards for Accreditation of Baccalaureate and Graduate Nursing Programs](#) criteria for faculty teaching clinical in a baccalaureate program who do not hold a graduate degree. Standard II Key Element II-F states:

"...however, any faculty teaching clinical in the baccalaureate program who do not hold a graduate degree:

- hold a baccalaureate degree in nursing;*
- have significant clinical experience;*
- are enrolled in a graduate program or **are otherwise qualified (e.g., have completed relevant graduate-level courses or continuing education units, hold relevant national certification) for the clinical area(s) in which they teach; and***
- have purposeful engagement with and formal oversight by a graduate-prepared faculty member."*

The Accrediting Commission for Education in Nursing (ACEN), which provides accreditations for all levels of nursing education, defers to the school's governing organization and regulatory agency requirements for faculty. [ACEN Criterion 2.1](#) specifies that faculty are nurses who “are *experientially qualified* for their assigned roles and responsibilities”; and “are *sufficient* in number”.

The third accrediting organization, the National League for Nursing Commission for Nursing Education Accreditation (CNEA) also accredits all levels of nursing education. [CNEA Standard III-A](#) requires “*The program’s faculty are qualified, diverse and adequate in number to meet program goals.*” CNEA Interpretive Guidelines acknowledge the role of non-Master’s prepared faculty: “*Programs that employ faculty without the graduate degree credential design and implement organizational development plans with a goal of demonstrating trending progression toward achieving a full complement of faculty who are prepared at the graduate level. The majority of faculty who do not hold graduate degree document evidence of active and steady progression toward achieving a graduate degree in nursing or a related field within a defined timeline.*”

Wisconsin Statutes Chapter 441 ‘Board of Nursing’ includes 441.01(3): *The board may establish minimum standards for schools for professional nurses and schools for licensed practical nurses, including all related clinical units and facilities, and make and provide periodic surveys and consultations to such schools.* BON administrative rules Chapter N 1 establishes these minimum standards. WHA and the organizations partnering with us on this letter ask the BON to align [Chapter N 1](#), the Wisconsin Administrative Code guiding nursing school approval, to national accreditation standards that allow greater flexibility for experienced BSNs to serve as nursing school faculty. This change would broaden the faculty pool to include registered nurses with a baccalaureate degree and front-line experience who are ready and able to help grow the nursing workforce.

Chapter N 1.08 (3) (b) 2. requires that faculty must have a graduate degree with a major in nursing. The BSN’s role is limited by the current exceptions offered by Chapter N 1.

- N 1.08 (3) (d) 1. provides a ‘Standard exception’ for faculty who are not teaching graduate level courses. This ‘standard exception’, that can apply to no more than 50 percent of faculty, requires a baccalaureate degree in nursing. The individual must be actively enrolled in a master’s program with a major in nursing, a bachelor’s in nursing to doctorate program in nursing, or a doctorate program in nursing.
- The only other exception for Wisconsin BON-approved nursing schools is N 1.08 (3) (d) 2., an ‘emergency exception’ for a short-term unanticipated emergency situation. An emergency exception allows a person with a bachelor’s degree in nursing to be employed for a term of no longer than one semester.

The current N 1 faculty requirements unnecessarily prevent experienced baccalaureate-prepared nurses, BSNs, who pursue ***graduate-level courses, continuing education, or national certification***, from serving as clinical faculty for nursing schools as ACEN standards allow, and well within the bounds of CCNE and CNEA requirements. These nurses, with the oversight of graduate-level faculty, can safely help reduce bottlenecks to clinical placements, create more diversity in clinical opportunities, and open up enrollment for the thousands of interested applicants turned away from nursing school each year, without jeopardizing nursing school accreditation. These already-prepared bachelor’s level nurses can also assure enough faculty to see students through their journey and to support incumbent faculty workload reduction.

One way BON could accomplish this would be to expand faculty standards by adding ACEN-allowed criterion to Chapter N 1:

N 1.08 (3) 4. 'clinical faculty non-master's degree exception.' A clinical faculty non-master's degree exception is for a person teaching clinical in a baccalaureate program who does not hold a graduate degree. The person shall meet all of the following:

- *hold a baccalaureate degree in nursing;*
- *have significant clinical experience;*
- *be enrolled in a graduate program or **be otherwise qualified (e.g., have completed relevant graduate-level courses or continuing education units, hold relevant national certification) for the clinical area(s) in which they teach;** and*
- *have purposeful engagement with and formal oversight by a graduate-prepared faculty member."*

As employers, we would welcome the opportunity to add this enhanced nursing role to the recruitment and retention strategies deployed to engage and support the nursing workforce so essential to providing the high quality and accessible health care Wisconsin expects and deserves. Expanding the role of BSNs to serve as clinical instructors will help reduce a bottleneck often identified by nursing schools and students: the availability of clinical sites and experience. BSN RNs would also support didactic instructors and assure the sufficient number of instructors essential to successful accreditation.

We respectfully request the Board of Nursing to allow nursing schools greater flexibility in meeting the needs of all who pursue a career in nursing at one of our great Wisconsin BON-approved nursing schools. Thank you for your thoughtful consideration, and for your appreciation of the impact such rule changes have on the nursing workforce, on hospitals and health systems, and on our partners in education.

Sincerely,



Ann Zenk
Senior Vice President Workforce & Clinical Practice
Wisconsin Hospital Association

cc: Governor Tony Evers

Members, Senate Committee on Health

Members, Assembly Committee on Health, Aging and Long-Term Care

Members, Senate Committee on Licensing, Regulatory Reform, State and Federal Affairs

Members, Assembly Committee on Regulatory Licensing Reform

Department of Safety and Professional Services Secretary Dan Hereth

Board of Nursing Executive Director Brad Wojciechowski