



# Nursing Education Foundation of West Virginia

## Association of Deans and Directors of Nursing Education

Sue Ann Painter, DNP RN  
Executive Director  
West Virginia RN Board  
5001 MacCorkle Avenue, SW  
South Charleston, West Virginia 25309

Nursing Education Foundation of West Virginia (NEFWV)  
July 12, 2023

Dr. Painter and the Board-

This letter's intent is to address the Nursing Education Foundation of West Virginia's concerns related to the changes in the Rule and Statement of Circumstances regarding 19CSR1.2.2. to amend the definition of Administrator Employment Time and eliminating the requirement for 80% of (nurse) administrator time devoted to administrative duties. In addition, it is our intent to address concerns related to eliminating prohibition of exceeding 6 credits per academic year and 3 credits per academic term or semester for the nurse administrator and instead, states that the "administrator of the nursing program's teaching responsibilities are determined by the needs of the program."

It is our understanding that the rule change only affects non-nationally accredited nursing programs in the state; however, the Accreditation Commission for Education in Nursing (ACEN), Commission on Collegiate Nursing Education (CCNE), and National League for Nursing Commission for Nursing Education Accreditation (CNEA) standards and criteria fall upon state codes when it comes to nursing program compliance. Specifically:

### ACEN:

Criterion 1.5 The nurse administrator:

- a. is oriented and mentored in the assigned roles and responsibilities;
- b. develops and maintains expertise in the assigned responsibilities, including administration and leadership of the nursing program; and
- c. has sufficient time for the assigned roles and responsibilities

Criterion 1.6 The nurse administrator has the authority to:

- a. administer and lead the nursing program;
- b. prepare the nursing program budget with faculty input; and
- c. administer fiscal resources allocated to the nursing program.

### CCNE:

Quality Indicator II-E The academic nursing unit is led by a chief academic nurse administrator who is educationally and experientially qualified for the role and

administratively entrusted with the responsibility and authorization to provide the leadership needed to procure and allocate resources to achieve the program's expected outcomes.

Interpretive Guideline: The program has written policies that describe the administrative role and responsibilities of the chief academic nurse administrator, including the responsibility to manage the procurement and allocation of the program's resources and budget for the purpose of facilitating achievement of the nursing academic unit's mission, goals, core values, and expected outcomes.

CNEA;

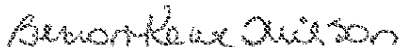
II-D The chief nurse administrator of the nursing unit:

- \* is a registered nurse (RN);
- \* holds a graduate degree in nursing;
- \* holds a doctoral degree if the nursing unit offers a graduate program in nursing;
- \* is vested with the administrative authority to accomplish the mission, goals, and expected program outcomes; and
- \* provides effective leadership to the nursing unit in achieving its mission, goals, and expected program outcomes.

Elaboration: The administrative authority of the chief nurse administrator is comparable to that of chief administrators of similar units in the institution. He or she consults, as appropriate, with faculty and other communities of interest to make decisions to accomplish the mission, goals, and expected program outcomes. The chief nurse administrator is an effective leader of the nursing unit.

We are most interested in scheduling a Special Board Meeting to address our concerns and recommended changes.

Respectfully submitted,



B. Kent Wilson, MSN RN CNE  
NEFWV President

# Davis & Elkins College

LEADING THE WAY

July 10, 2023

Sue A. Painter, DNP RN  
Executive Director  
West Virginia RN Board  
5001 MacCorkle Avenue, SW  
South Charleston, West Virginia 25309

Re: 19CSR1

Dr. Painter and the Board,

This letter is to address concerns related to the changes in the 19-1-2 Definitions 2.2 to amend the definition of Administrator employment time and eliminating the requirement for 80% time to school administrative duties. Also, to address concerns related to eliminating administrator of the nursing program's teaching responsibilities. In particular removing of "is not to exceed 6 academic semester credits per academic year, no more than 3 academic credits per semester" and replacing the language with "administrator of the nursing program's teaching responsibilities are determined by the needs of the program."

As the Director of the Associate Degree Nursing Program at Davis & Elkins College I spend a lot of my time performing my assigned roles and responsibilities as Director in addition to teaching one class in the fall (2 credits) and one class in the spring (3 credits). The Director has an important role of leading the faculty and nursing program as well as rapport with communities of interest to make decisions to accomplish the mission, goals, and program outcomes. Adding additional teaching responsibilities to my current workload would not allow sufficient time for the assigned roles and responsibilities as Program Director. This release time is important so that I can effectively lead my nursing program and ensure that program outcomes are met. Our nursing programs would suffer, and the quality of the program and the program outcomes would be affected.

The Accreditation Commission for Education in Nursing (ACEN) Standards and Criteria fall upon state codes when it comes to compliance. Specifically:

ACEN;

Criterion 1.5 The nurse administrator:

- a. is oriented and mentored in the assigned roles and responsibilities;
- b. develops and maintains expertise in the assigned responsibilities, including administration and leadership of the nursing program; and
- c. has sufficient time for the assigned roles and responsibilities

Criterion 1.6 The nurse administrator has the authority to:

- a. administer and lead the nursing program;
- b. prepare the nursing program budget with faculty input; and

# Davis & Elkins College™

LEADING THE WAY

c. administer fiscal resources allocated to the nursing program.

It is my understanding that the rule change only affects non-nationally accredited nursing programs in the state; however, I would advocate that new nurse administrators need release time also. New nurse administrators need time to learn the Code State Rules and the Standards and Criteria for National accreditation.

Please consider supporting the schools of nursing by giving nurse administrators release time from additional teaching responsibilities to allow time for director responsibilities in the code state rules.

Respectfully,

*Melissa McCoy*

---

Melissa McCoy, PhD RN  
Director, Associate Degree Nursing Program

# Davis & Elkins College

LEADING THE WAY

Sue Ann Painter, DNP RN  
Executive Director  
West Virginia RN Board  
5001 MacCorkle Avenue, SW  
South Charleston, West Virginia 25309

Huixin Wu, DNP, MBA, RN, CCRN-K, CCNS  
Chair of Division of Nursing  
Director of Bachelor's Nursing Programs  
Davis & Elkins College  
SC215A  
100 Campus Drive  
Elkins, WV 26241

July 13, 2023

Dear Dr. Painter and the respectful WV RN Board members,

I am writing this letter to express deep concern about the changes in the Rule and Statement of Circumstances regarding 19CSR1.2.2. to amend the definition of Administrator Employment Time and eliminate the requirement for 80% of (nurse) administrator time devoted to administrative duties. Also, it removes the prohibition of exceeding 6 credits per academic year and 3 credits per academic term or semester for the nurse administrator. Instead, it states that the program's needs determine the "administrator of the nursing program's teaching responsibilities."

If the RN Board insists on such changes, predicting the following outcomes in a year or two is easy. First, the nursing administrators who do not mind relocating will accept the same chief academic nursing administrator jobs outside of West Virginia (WV) but with much higher salaries (usually 1.5-2 times WV's pay. There is a high demand for qualified and experienced chief academic nursing administrators nationwide because of the booming nursing programs everywhere since pandemics). Second, the nursing administrators who want to stay in the same institute will step down from the administrator position and work as full-time faculty. With similar pay but much less responsibility, it is not hard to make that decision. Third, the WV RN Board will have to find a solution then to assist in recruiting and retaining nursing administrators in WV 77 nursing programs. Accreditation is a detailed, lengthy, and tedious process that took most of my daily work time besides my other administrative work. Without qualified and experienced chief academic nursing administrators, it will be a big question mark how many nursing programs in WV can still successfully pursue and/or remain accredited status.

We all know recruiting, training, and retaining nursing faculty members takes a lot of work. Recruiting, training, and retaining nursing administrators in higher education is much more challenging. This is approved directly from the State of Nursing Education Report that the Board released in March:

# Davis & Elkins College

LEADING THE WAY

"Nursing program director changes reported in the past 5 years ranged from 1 to 6 changes. One program reported they had 6 directors in 5 years. Regulatory guidelines and evidence-based quality indicators for nursing education identify programs with more than 3 directors within 5 years as warning signs (Spector et al., 2020)."

I love my college and colleagues as my ADDNE peers. However, loving working environments and colleagues is not the only factor to consider when choosing a job, besides salary and working load. The data above for the nursing directors the board collected in the past five years vividly demonstrates it. I was shocked to know that I am one of the senior members of the ADDNE lately. I've been in ADDNE for only five years. To me, this seniority is not a good sign. With the code change, I foresee the director turnover rate will become worse.

Thus, it may be a good idea that the Board rethink the change listed at the beginning of the letter for the health growth and sustainability of WV 77 nursing programs (and more in the future). Also, it is time for the Board to consider practical measures and policy changes to improve chief academic nursing administrator retention in WV before things become too bad to control.

Thank you for your time reading this letter and hard work to serve on the Board.

Sincerely,



Huixin Wu, DNP, MBA, RN, CCRN-K, CCNS  
Chair - Division of Nursing  
Director - Bachelor's Nursing Programs  
Associate Professor of Nursing  
Davis & Elkins College



---

School of Nursing

Sue Ann Painter, DNP RN  
Executive Director  
West Virginia Board of Examiners for Registered Professional Nurses  
5001 MacCorkle Avenue, SW  
South Charleston, West Virginia 25309

Nursing Education Foundation of West Virginia (NEFWV)  
July 14, 2023

Dr. Painter and the Board,

This letter's intent is to address the Nursing Education Foundation of West Virginia's concerns related to the changes in the Rule and Statement of Circumstances regarding 19CSR1.2.2. amending the definition of Administrator Employment Time and eliminating the requirement for 80% of (nurse) administrator time devoted to administrative duties. In addition, it is our intent to address concerns related to eliminating prohibition of exceeding 6 credit s per academic year and 3 credits per academic term or semester for the nurse administrator and instead, states that the "administrator of the nursing program's teaching responsibilities are determined by the needs of the program."

It is our understanding that the rule change only affects non-nationally accredited nursing programs in the state; however, National League for Nursing Commission for Nursing Education Accreditation (CNEA) standards and criteria fall upon state codes when it comes to compliance. Specifically:

CNEA,

II-D The chief nurse administrator of the nursing unit:

- Is a registered nurse (RN).
- Holds a graduate degree in nursing.
- Holds a doctoral degree if the nursing unit offers a graduate program in nursing.
- Is vested with the administrative authority to accomplish the mission, goals, and expected program outcomes; and
- Provides effective leadership to the nursing unit in achieving its mission, goals, and expected Program outcomes.

Elaboration: The administrative authority of the chief nurse administrator is comparable to that of chief administrators of similar units in the institution. He or she consults, as appropriate, with faculty and other communities of interest to make decisions to accomplish the mission, goals, and expected program outcomes. The chief nurse administrator is an effective leader of the nursing unit.

Respectfully submitted,

*Stephanie Holaday*

---

Dr. Stephanie Holaday DrPH, MSN, CNE  
Dean of Nursing and Health Sciences

*Jennifer Greathouse MSN, RN*

---

Jennifer Greathouse MSN, RN  
Interim Director of Nursing



# Nursing Education Foundation of West Virginia

Association of Deans and Directors of Nursing Education

Sue Ann Painter, DNP RN  
Executive Director  
West Virginia RN Board  
5001 MacCorkle Avenue, SW  
South Charleston, West Virginia 25309

Michael D. Payne  
WV RN Board Attorney  
July 14, 2023

Drs. Painter, Payne, and the Board-

This letter's intent is to address the changes in the Rule and Statement of Circumstances regarding 19CSR1.2.2. to amend the definition of Administrator Employment Time and eliminating the requirement for 80% of (nurse) administrator time devoted to administrative duties and concerns related to eliminating prohibition of exceeding 6 credit s per academic year and 3 credits per academic term or semester for the nurse administrator and instead, states that the "administrator of the nursing program's teaching responsibilities are determined by the needs of the program."

I am most interested in attending a Special Board Meeting to address my concerns and recommended changes.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "B. Kent Wilson".

B. Kent Wilson, MSN RN CNE  
NEFWV President