



Office of the President

January 12, 2023

Winifred M. Hagan, Ed.D.
Massachusetts Department of Higher Education
1 Ashburton Place, Suite 1401
Boston MA 02108
Dear Addressee:

Dear Dr. Hagan,

I appreciate the opportunity to respond to the concerns expressed by Berkshire Community College (BCC) during the public comment period regarding Massachusetts College of Liberal Arts' (MCLA) proposed Bachelor of Science in Nursing (BSN) program. BCC was at the table for conversations at the infancy of MCLA's program and they have been aware of program developments along the way. The impetus for MCLA's program came from conversations with local healthcare partners to address the increasing healthcare demands in Berkshire County and beyond. President Kennedy attended the meeting I had with then Berkshire Health Systems CEO, David Phelps, and current CEO, Darlene Rodowicz, when they asked MCLA to develop a four-year, residential nursing program. Following that meeting, Dr. Kennedy and I discussed a "2+2" nursing partnership program that created a pathway for BCC students to complete their BSN at MCLA. Dr. Kennedy rejected the 2+2 program and instead proposed a 3+1 program. I did not support that program as there were not enough students in the BCC pipeline to support such a program at MCLA. However, it has always been MCLA's intent to include a completion program with BCC and other institutions once we have established a four-year, residential program. It appears from her letter that Dr. Kennedy is not supportive of an MCLA program nor partnership. I hope her position will change.

MCLA also considered how it might best serve BCC's RN students as they fulfill a BS credential. It was through these conversations and a deeper understanding of the Massachusetts Board of Registration in Nursing (BORN) process that MCLA realized it would need its own pre-licensure program first to create strong pathways to address the educational needs of BCC RNs, to best serve Berkshire County and its unique rural healthcare needs. From the beginning, MCLA's program was designed with clear transfer pathways in mind, committing to the tenets of the MA Nursing Education Transfer Compact. BORN approved MCLA's program this past Wednesday, January 11, 2023, attesting to the quality of MCLA's program.

There is no question as to whether or not there is a demand for nurses, particularly Bachelor's educated nurses in Berkshire County and in the Commonwealth. For example, a recent Burningglass (a data-driven research and practice firm focusing on the future of work and of workers) report showed 211 nursing vacancies in Berkshire County for December 2022. MCLA's program would serve a critical need as outlined by the Berkshire County Regional Skills Workforce Blueprint. The BCC letter was a surprise to all of us at MCLA. Not only does it conflate our very different student demographics, but it also claims that BCC alone can address the tremendous need for nursing within the region. BCC's summarizing statement -- "not only is there insufficient demand for the educational programming proposed by MCLA, but approval will make it more difficult for institutions like BCC that are already meeting demand..." -- is both inaccurate and misleading. There are substantive differences between MCLA's proposed BSN

and BCC's Associate Degree in Nursing (ADN). BCC's ADN is an entry-level, technical nursing degree designed to give students a program that focuses exclusively on nursing practice. The ADN is a two-year degree, though most students at BCC take an additional year to complete the program. Conversely, the MCLA BSN curriculum includes courses focusing on professional practice as well as significant emphases on community and global health and health policy and research. The BSN is designed to be completed in four years, culminating in a professional, not technical, nursing degree. With a grounding in the liberal arts, MCLA's BSN program will focus on the cultural, political, economic, and social issues that affect safe patient care and influence healthcare delivery.

Similarly, there is a significant demographic distinction between current BCC nursing students and students who attend MCLA. The average community college ADN student is 37-44 years old with an approximate 20-year nursing career trajectory; the MCLA BSN degree is designed for traditional college students, entering directly from high school at approximately 18 years old with a near 50-year professional nursing career trajectory. BCC anecdotally notes they have heard students are shying away from nursing as we come out of the COVID-19 pandemic, and they express concerns that there are insufficient numbers of nursing students in the County to support another nursing program. However, MCLA's program is designed to attract new nursing prospects into the region. As a top 10, nationally ranked liberal arts college, MCLA draws students from 26 states and from every county across Massachusetts. The MCLA Office of Admission routinely receives 200+ inquiries per cycle from students interested in a BSN program, despite MCLA not having a nursing program. In addition, students in the region routinely leave for other BSN programs. A recent inquiry to the National Student Clearinghouse (an educational nonprofit that provides educational reporting, verification, and research services) of MCLA applicants showed that 29 recent Berkshire County high school graduates enrolled at a BSN programs elsewhere in Massachusetts or outside of the Commonwealth. The MCLA program will offer the opportunity to bring into the County nursing students from across the country while also retaining students who now choose to leave the Berkshires for their education. MCLA is well-positioned to launch a program that will directly help alleviate the nursing shortage in Berkshire County from a recruitment pool of students distinct from BCC.

With regard to demand for a BSN program in the County, we note that Southern Vermont College, the only baccalaureate nursing program in this rural tri-state region, closed its doors in 2019, leaving a critical gap in the BSN-educated nursing pipeline. As a result of this closure, the MCLA BSN program will be able to support a variety of healthcare facilities that serve this rural area who depended on SVC's nursing program. Our healthcare partners continue to assert that there are more than enough clinical spaces for nursing students from both BCC and MCLA, as the demand for newly licensed RNs continues to increase. We received documentation of support for clinical spaces from Berkshire Health Systems, Integritus Healthcare, Southwestern Vermont Healthcare, and Berkshire Place Elder Care. These employers affirm the urgent need for a BSN program in rural Berkshire County. In fact, Berkshire Health Systems provided MCLA with a second letter of support stressing the importance of a BSN program at MCLA in response to BCC's concerns.

As the only nursing program in the Berkshires, BCC is not able to meet the healthcare demands of the community, providing only 26 employable associate degree nurses in 2021. As we document in our LOI, workforce development research shows that nursing is the most in demand occupation in Berkshire County with many unfilled nursing vacancies within Berkshire Health Systems alone. In addition to this significant shortfall of duly licensed BCC ADNs, Berkshire County is experiencing a critical shortage of

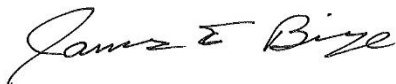
Registered Nurses educated at the baccalaureate level.

Finally, as the only BSN program in Berkshire County, MCLA will benefit from recruiting within the rural tri-state region. MCLA Admissions staff are prepared to work with students who prefer to complete nursing pre-requisites at a community college and transfer into MCLA for upper-level courses and nursing instruction. MCLA will follow the same recruitment and A2B Transfer Pathway program for nursing as with all other programs. As articulated in MCLA's submitted Undergraduate Program Curriculum Outline, nursing specific (NURS designated) courses total 56 credits, allowing up to 64 non-nursing credits to be transferred to the MCLA BSN program. This will provide even more support for our community college partners, especially BCC. MCLA's Admissions team completes 75-100 targeted transfer visits each year to partner community colleges and with the launch of a nursing program, we plan to include specialized visits, similar to a model we already use for our clinical program in Radiologic Science. As part of our marketing and outreach plan for the launch of the BSN program, MCLA has tailored communications planned to appropriate community college offices to recruit their students, as well as create detailed and tailored articulation agreements.

Additionally, a next step after approval is to begin the work for a RN to BSN program, specially addressing the needs of community college students. Earlier work on this was not possible until initial approval from BORN, which directly addresses BCC's initial concerns regarding additional pathways for their students.

I view Berkshire Community College as an important partner in the county and very much look forward to working with them to create a stable nursing infrastructure within the region. MCLA's goals are not to take students or faculty away from the BCC program, but rather to bring more nurses into the region to support the vital healthcare needs in our rural setting. MCLA is prepared and willing to work with BCC to create a strong transfer pathway for nursing, to strengthen each of our respective programs, and to develop more opportunity for students.

Respectfully,



James F. Birge, Ph.D.
President