

December 11, 2022

Winnie Hagan  
Senior Associate Commissioner for Strategic Planning and Public Program Approval  
Massachusetts Department of Higher Education

Dear Winnie,

Berkshire Community College (BCC) has a long history of supporting Massachusetts College of Liberal Arts (MCLA), its higher education neighbor, in the innumerable ways in which we individually and collaboratively provide and enhance opportunities to students of all ages in Berkshire County. After careful consideration, however, we believe that MCLA's proposal to begin a Nursing Program will have unintended impacts on BCC's ADN program and more importantly cause additional shortages of currently strained clinical nursing education sites. Accordingly, we submit our comments to the proposal, sharing our concerns and communicating the initiatives currently underway at BCC.

Berkshire Community College was the first community college established by the Commonwealth of Massachusetts and has had a successful associate degree nursing (ADN) program for over 50 years. BCC has also run a Practical Nurse (PN) program since 1985 and provides an educational mobility program to current LPNs who wish to continue their education and become registered nurses. These LPNs can enter the program in the 3<sup>rd</sup> semester and complete their studies to bridge as an LPN to ADN in 2 semesters. The cost of tuition and fees at BCC for a full-time, in-state student is \$6,692 per year, providing quality education at an affordable cost.

**In response to *Alignment with Massachusetts Goals for Public Higher Education 1***, BCC has employed a Nursing faculty member to work as an RN to BSN advisor for many years. This advisor meets with students, often as pre-nursing students, to create an educational plan that includes acquiring their BSN. We have strong partnerships with Elms College, UMass Amherst, Westfield State University, Southern New Hampshire University, and the University of Rhode Island to support students in this pursuit. Students can complete 60 of their required non-nursing credits toward a BSN right here at BCC, thus transferring 90 credits toward a BSN (The 120 credits for graduation are derived as follows, using UMass Amherst as an example):

1. Nursing Prerequisite, General Education and electives — 60 credits
2. RN Licensure — 30 credits
3. RN to BS Track — 30 credits (at the BSN granting institution)

The first 90 credits at the cost of associate degree courses. Many of these programs are available online which allows students to work as Registered Nurses, after completing our associate degree program; they continue their education while meeting employment needs in our community. For many years, Berkshire Health Systems (BHS) has financially supported RNs pursuing a BSN while working as nurses. Nurses taking the RN to BSN pathway are in the field as nurses at least a year earlier than those who begin their pursuit of an RN at a BSN granting institution.

**In response to A, section 4, “Berkshire County’s healthcare industry has a supply gap with more openings than applicants, remains aligned with the Region’s economic development strategic focuses, and can offer career pathways that enable healthcare professionals to grow their careers without having to relocate.”** In common with all community colleges, it is BCC’s goal to train local students, at a low or no cost, who will remain in the workforce here in Berkshire County. BCC graduated 40 ADN students in 2021, 54 ADN students in 2022, and is projected to graduate 21 this winter and 56 in the spring of 2023. Our completion rates for the past two years have been 84% for 2021 and 93% for 2022, far exceeding the MABORN completion rate of 70%.

We currently enroll 25 students from Adams, Cheshire, North Adams, Clarksburg, Williamstown, and Vermont, in the program out of 119 students (21%). In January, we have accepted 11 students from the same towns and Vermont out of 50 students admitted (22%).

Furthermore, the statement in section 4 that reads, ***“The Registered Nursing occupation (along with Nurse Practitioners and Vocational Nurses) is facing the highest level of employee shortage, with the occupation projected to continue to grow over the next decade indicating need for more nurses to be educated. Nursing is the most in demand occupation in Berkshire County with many unfilled nursing vacancies within Berkshire Health Systems alone”***. BCC stepped into action in response to the community’s needs during a pandemic and began offering an additional entry point into the ADN program in spring 2021 to try to meet the needs of our workforce. We hired faculty, renovated former classrooms, which added two additional nursing lab spaces on campus, invested in simulation equipment, and applied for grants for additional simulation equipment. We were awarded a federal grant through the US Department of Education for \$350,000 this past October allowing us to add improved simulation to our newest labs.

Admissions in the ADN program were 124 students enrolled in 2020-2021, 142 students enrolled in 2021-2022, and 173 students enrolled in 2022-2023 with 21 graduating this December as our first winter graduates. While we have space for 200 total nursing students annually, we have found that there are less students interested in nursing since the pandemic.

BCC distributed a survey in the spring of 2021 to over 200 pre-nursing students to gather data on why students were not applying to the ADN program in a timely manner. The survey results overwhelmingly concluded that students were not applying because they were financially unable to give up their jobs and associated benefits to attend school full-time. BCC shared this

response with our Berkshire Health Systems partner and together we established a Talent Pipeline program for both ADN and PN students. This Pipeline provides full-time pay and benefits to students while in the nursing program, requires the students to work eight hours per week, and covers all their educational finances, including tuition, fees, books, and uniforms for the duration of the program. We expected a huge response but found limited interest. We also have partnerships with Fairview Hospital for a nurse apprentice program and with Integritus Healthcare for a Stepping Stone program. The opportunities for residents of Berkshire County to attain a nursing degree at no or low cost presently exceeds the demand.

**In response to A, section 6**, BCC also uses high fidelity simulation and will have culturally diverse manikins including three maternity simulators, three infant simulators, three five-year-old child simulators and three adults as well as two SimServe Medication Dispensing Systems to prepare students for medication administration in the acute care setting. BCC also uses ATI for testing, support and offers a live NCLEX-RN review course, which is the same exam associate degree students take upon completion of a 2-year degree.

In addition, BCC provides thousands of dollars annually in scholarships to incoming and continuing nursing students. Given its over 50-year history, Nursing has been a focal point for philanthropic giving. In November, we received a \$20,000 gift to cover unmet financial need for students enrolled in their second year of the AND program. We could provide the precise amount awarded last year if requested.

In response to ***Alignment with Massachusetts Goals for Public Higher Education 3 and the statement “BHS will be a strong partner by hosting MCLA nursing students for clinical experiential learning throughout their health systems including acute care, long term care and community health”***, The Nursing Program at BCC has long-standing and strong partnerships in the community and contracts with Berkshire Medical Center, Fairview Hospital and 90% of all skilled nursing facilities in the Berkshires. We also have contracts with every school district.

Notwithstanding, there is limited clinical availability in the acute care setting with only five floors available countywide for nursing students during the day and evenings. BCC has students in clinical settings in skilled nursing facilities on Monday/Tuesday and Thursday/Friday and on all units at BMC and Fairview both days and evenings Tuesday-Friday. We share these spaces with two other Practical Nurse programs and often are required to modify schedules to work around other programs. UMass Amherst and Elms College also have students in the acute care clinical settings. The presence of limited clinical availability is especially present in maternity as only five students are allowed on the unit at a time. We utilize high fidelity simulation for most of the pediatric content of the program as there is no available pediatric acute care units. Students also rotate to other community settings, working with school nurses. MCLA’s proposed program will put further strain on the existing lack of clinical sites in both the acute care and skilled nursing facilities within the Berkshires. BCC currently has an established and active “community of interest advisory board that meets annually to discuss opportunities for

program community engagement, outreach and ways to improve the overall quality of the nursing education unit.”

In conclusion, 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 to justify continued allocation of resources to provide the most outstanding experience possible if the supply of students is spread more thinly. In conclusion, it is our belief that the presence of another nursing program in the Berkshires will weaken both institutions, considering the cost of nursing programs, and the competition for faculty and clinical sites.

We welcome the opportunity to discuss our comments if that would be useful in this review.

  
Ellen Kennedy

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Jamie Birge, President MCLA