



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
Nursing Care Quality Assurance Commission
PO Box 47864 Olympia, WA 98504-7864

April 5, 2019

To Whom it May Concern,

The Nursing Care Quality Assurance Commission (commission) has adopted amendments to WAC 246-840-533, Nursing preceptors, interdisciplinary preceptors, and proctors in clinical or practice settings for nursing education programs located in Washington State. The amendments provide clarification and reduce barriers for nursing student access to preceptors for the purpose of completing statutorily required clinical experience. The amendments also reduce barriers for qualified individuals to become preceptors and proctors in Washington State. The effective date for the rule change is April 26, 2019.

An announcement regarding the CR-102 filing and open public comment period was broadly distributed to all GovDelivery topic subscribers and other interested parties on December 7, 2018, after which public comments were accepted until January 2, 2019. During that time, four formal written comments were received. Three additional public comments, provided in both oral and written form, were received during the open public hearing on January 11, 2019. The majority of comments received by the commission were supportive of the proposed amendments to WAC 246-840-533, with a couple of questions regarding clarification of terms used within the rule (*summary provided in Table A*).

The commission made two non-substantive changes during the rules hearing to address concerns presented to the commission through public testimony. The term “graduate nurse” was removed from WAC 246-840-533 (1)(a) and (1)(b) in order to eliminate the possibility of the term being misinterpreted as newly graduated RNs or resident RNs, instead of graduate level nursing students. In addition, the term “any” was added prior to “nursing student” so that the intent is made clear that the rules apply to preceptors and proctors used during any nursing student clinical experiences. The second change made at the hearing was the addition of the word “primary” prior to “nursing and interdisciplinary preceptor” to address the concerns provided during public testimony. Any remaining opposition to the rule, primarily in regard to rule language interpretation, will likely be resolved through education and outreach activities by the commission.

For more information regarding these rules or the rulemaking process, please contact the NCQAC Policy and Performance Analyst at amber.zawislak@doh.wa.gov.

Sincerely,

Paula R. Meyer, MSN, RN, FRE
NCQAC Executive Director

Table A: Summary of Comments Considered

CITATION	COMMENTS ON PROPOSED RULES	COMMISSION RESPONSE
WAC 246-840-533	Several comments received in support of the amendments to the rule and the acknowledgment that the changes in preceptor and proctor requirements for nursing education will result in likely improvements to nursing student clinical experiences.	No response necessary, but the commission acknowledged the comments made in support of the amendments and thanked the many stakeholders who contributed to the conversations which led to the adopted amendments.
WAC 246-840-533 (1)(a) and (1)(b)	Concern surrounding the lack of clarity for the term “graduate nurse” since the rule is referring to nursing students. The term “graduate nurse” could be misinterpreted to describe newly graduated RNs or resident RNs, instead of graduate level nursing students.	The commission deliberated on this concern during the hearing and ultimately decided to remove the term “graduate nurse” from WAC 246-840-533 (1)(a) and (1)(b). In addition, the term “any” was added prior to “nursing student” so that the intent is made clear that the rules apply to preceptors and proctors used during any nursing student clinical experiences.
WAC 246-840-533(2)	Concern regarding the requirement for nursing education faculty to confer with each nursing and interdisciplinary preceptors during each of the three phases (beginning, middle, and end). Nursing students may work with multiple nurses during a preceptor experience. This may occur due to the primary preceptor's illness, a staffing need, or a specific patient assignment. If the student is assigned to a primary preceptor, but works with multiple staff, perhaps the conference would be with the primary preceptor.	The commission deliberated this concern during the hearing and discussed the intent of the rule to apply to the primary preceptor assigned to each student. The commission decided to add the word “primary” prior to “nursing and interdisciplinary preceptor” to address the concerns provided during public testimony.
WAC 246-840-533(2)	Suggestion for the commission to consider removing the specific times in which faculty must confer with the preceptor during the student learning experience. Concern that some preceptor clinical experiences may be very short and not allow enough time for three conferrals between the nursing education faculty and preceptor.	The commission discussed this concern and suggestion during the hearing, but ultimately decided that the three points of contact between nursing education faculty and the primary preceptor assigned to the student is necessary to ensure that student learning objectives are being met. No changes were made based upon this comment.
WAC 246-840-533(5)(a)	Concern regarding the use of interdisciplinary preceptors for nursing education and proposal for subsection (5)(a) of current WAC to remain unchanged.	The commission recognizes the concern, but also is aware of the role that nursing education programs and faculty have in determining if an interdisciplinary preceptor will benefit the student learning objectives for each clinical experience. Interdisciplinary clinical experiences provide valuable learning opportunities for nursing students. No changes were made based upon this comment.

CITATION	COMMENTS ON PROPOSED RULES	COMMISSION RESPONSE
WAC 246-840-533	<p>General concern that other healthcare systems or facilities may have a different definitions of preceptors within collective bargaining agreements and that the commission's definition may lead to confusion for employees.</p> <p>Recommendation for the commission to include language that preceptors participate in evaluation of the learner on an on-going basis, to insure the WAC is not misinterpreted to mean that anyone who works with a student is a preceptor.</p>	<p>The commission understands that other entities may have an alternative definition for preceptors, but the WAC is clear in that the definition applies only to preceptors used in the context of WAC 246-840-533. No changes were made based upon this comment.</p>