

Board of Nursing Agency Response to Economic Impact Analysis

The Board of Nursing makes the following comment on the Economic Impact Analysis (EIA) of the Department of Planning and Budget on proposed amendments to 18VAC90-20-10 et seq., Regulations Governing the Practice of Nursing, relating to rules for nursing education programs.

On page 2, the EIA refers to the cost for conducting market analyses as part of a program's application for board approval of a new nursing education program. It was acknowledged that many programs already conduct such an analysis to assess the viability of and need for an educational program in the area from which the program intends to draw students. In the EIA, there is a statement that a program conducting a market analysis may incur costs of "many thousands of dollars." In fact, programs that have conducted an analysis report to board staff that the costs ranged from \$1,000 to \$5,000, depending on the extensiveness of the analysis and the geographic location of the school. Therefore, the Board takes exception to the assumption that an analysis would cost many thousands of dollars and would recommend that the range of actual cost be stated. *(The Department of Planning and Budget subsequently revised its EIA accordingly.)*

Additionally, the EIA states that the requirement for potential nursing students to have a criminal background check would cost affected entities \$422,800. In fact, a criminal background check is already a requirement before any student can be engaged in a clinical setting. The Joint Commission on Accreditation of Healthcare Organizations (JCAHO) has such a requirement, and all hospitals and long term care facilities require the criminal background check for employees and students working in their facilities. Therefore, there would be no additional cost for the background check since it is already required for persons enrolled in nursing education programs.