

**IDAHO BOARD OF NURSING
COMMENTS RECEIVED ON PROPOSED RULES
DOCKET 23-0101-1501 AND 1503**

I. INTRODUCTION

Consistent with requirements for agencies wishing to engage in the process of negotiated rulemaking, a public meeting was held Thursday, July 16, 2015 at 10:00 am (MDT) at SpringHill Suites by Marriott, 424 E. ParkCenter Blvd, Boise, Idaho to consider proposed rules of the Board of Nursing, Dockets No. 23-0101-1501, 1502 and 1503. Notice of the meeting was published in the June 3, 2015 Idaho Administrative Bulletin.

Persons wishing to participate in the negotiated rulemaking were invited to:

- 1) Submit any written comments, questions, recommendations, or ideas to the Board of Nursing
- 2) Attend the scheduled public meeting on July 16 during which the Board invited oral comments and/or presentations on the proposed rules

II. COMMENTS RECEIVED ON DOCKET 23-0101-1501

Written and oral comments relative to Docket 23-0101-1501 were received prior to the close of business on July 16, 2015 from:

- A. St. John's Faith Community Services Coordinator
- B. Idaho Alliance of Leaders in Nursing (IALN) Nurse Residency Program Project Director
- C. President, Idaho Nurses Association
- D. St. Alphonsus Regional Medical Center Faith Community Nursing Coordinator
- E. President, Boise Friendship Clinic
- F. Retired RN
- G. Director, Nursing Education, ITT Technical Institute

Comments were primarily in support of the proposed rules and also included questions related to specific scenarios related to the subject of the proposed rules, e.g.:

- The proposed rules are "clean and friendly. They are sufficiently broad and should allow almost any nurse to be able to meet them. Specifically, they address earlier concerns
- "Looks good!"
- "Rules as proposed are reasonable and may be accomplished by most volunteer faith community nurses"
- "The rules as proposed address previous concerns and validate what we know: nursing is not just at the bedside in a hospital. Nursing is an influence in our communities, in our churches, at organized events—I encourage [our members] to reach out to support [adoption of these rules] this legislative session"
- "The Board heard our concerns and refined the rules to address them—"I love these rules!"
- "Thank you, Board of Nursing, for your responsiveness" (President, The Friendship Clinic, Boise)
- "We need to remain aware of related issues", e.g. access to simulation labs, affordability, etc. in order to retain older nurses in the Idaho nursing workforce
- "Will serving as a tutor for 'refreshing' nurses/students meet requirements for active practice?"

III. COMMENTS RECEIVED ON DOCKET 23-0101-1503

Comments relative to Docket 23-0101-1503 were received from:

- A. Diabetic Educator, Madison Memorial Hospital: Supported the rules as proposed and identified a concern expressed by the hospital's Risk Management Director related to section 402.02.c. Further, "As written, the nurse is held accountable to perform within the parameters of his/her education and demonstrated competence" and in accordance with agency/facility policies and guidelines.
- B. Madison Memorial Hospital, Risk Management/Compliance Director: Raised concern that the rules may be inconsistent with state and federal laws for hospitals that indicate 'written protocols must be approved by the medical staff, nursing and pharmacy'.
- C. Association of Perioperative Registered Nurses (AORN): Indicated "rules as proposed align with the AORN's...suggestions" related to compliance with accepted national standards for specialty nursing practice.

IV. BOARD DELIBERATION AND CONCLUSIONS

Following the public meeting, the Board carefully considered all comments received and took the following actions:

- A. **For Proposed Rule Docket 23-0101-1501:**
 1. Amend §061.01 to clarify the total number of activities necessary to meet requirements; and
 2. Amend §061.05 to clarify the exemption provision.
- B. **Proposed Rule Docket 23-0101-1502:**
 - Vacate the Notice of Intent to Promulgate Rules.
- C. **Proposed Rule Docket 23-0101-1503**
 - Delete §402.01.c to avoid confusion related to employer responsibilities resulting from federal/national regulations vs those of the Board of Nursing.
- D. **Proceed with rulemaking on Dockets 23-0101-1501 and 1503 as amended.**