

Re: **Submission to 85<sup>th</sup> Texas Legislature Session, Sunset Commission, Texas Board of Nursing Review**

([https://www.sunset.texas.gov/public/uploads/files/reports/Board%20of%20Nursing%20SER%20Final\\_0.pdf](https://www.sunset.texas.gov/public/uploads/files/reports/Board%20of%20Nursing%20SER%20Final_0.pdf))

Date: November 8, 2016

By: Jane Ezell, PhD, MA, BSN, RN

Per the Texas Sunset Act the Texas Board of Nursing submitted a comprehensive operating report (Texas Board of Nursing Self Evaluation) to the Sunset Commission, September 2015, followed in October 2016 by an Executive Summary and Full Staff Report.

I respectfully submit my comments to the commission. My comments follow the first two issues (Issue 1 and 2) the board submitted, highlighted in the executive summary and full staff report, in the context of the operating report.

The first (Issue 1) is Excelsior academic Nursing Program of Associate Degree graduates to enter Texas licensure. The curriculum is not equivalent or comparable to Texas standards. I strongly recommend removing this education and licensure program. There is clearly no base for it in Texas. There is no empirical evidence of being equivalent to Texas nursing requirements to enter licensure. The curriculum is not clinically centered. It fails to build the base for patient-centered evidence-based care, collaborative teamwork, interdisciplinary communication and informatics as mandated nationally and reflected in the 2010 minimum entry competencies for Texas nurses. The absence or exclusion of clinical preparation with demonstrated performance development milestones fails to shape the essential and basic dimensions to nurse in the new paradigm of health care. It severely impedes systems employing those graduates, and increases risk to the public as recipients of care and contact. More emphatically than the board, I recommend Excelsior's current program be eliminated from the opportunity to educate nurses for Texas licensure, by non-renewal, expiration of any previously authorization exception or other means.

The second issue (Issue 2) is **"clarify the definitions of unprofessional conduct and good professional character"**. I strongly support the board's recommendation to further define and clarify unprofessional conduct and good professional character. I support the drive from subjectivity to objectivity, especially with the determination of an individual's character, public risk, criminal behavior, impairment or other fitness for duty involved in the unprofessional conduct equation. Clear unambiguous definitions standardize terms, operations and decisions. With uniform evidence-based, well-researched definitions, academic, practice and enforcement align as mutually supportive with clear and explicit conduct boundaries. I recommend the board be authorized to follow their recommendations to build continued effectiveness of 217.11 in the evolving environment.

Respectfully submitted, Jane Ezell, PhD, MA, BSN, RN

**From:** [Sunset Advisory Commission](#)  
**To:** [Cecelia Hartley](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, November 09, 2016 9:20:29 AM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, November 09, 2016 8:43 AM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS BOARD NURSING BON

First Name: Jane

Last Name: Ezell

Title: Seton

Organization you are affiliated with: Self

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

Date: November 8, 2016

By: Jane Ezell, PhD, MA, BSN, RN

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uniform evidence-based, well-researched definitions, academic, practice and enforcement align as mutually supportive with clear and explicit conduct boundaries. I recommend the board be authorized to follow their recommendations to build continued effectiveness of 217.11 in the evolving environment.

Respectfully submitted, Jane Ezell, PhD, MA, BSN, RN

Any Alternative or New Recommendations on This Agency: No.

My Comment Will Be Made Public: I agree