



UNIVERSITY OF
NORTHERN
COLORADO

Office of the Provost

June 7th, 2023

Dr. Chris Rasmussen
CDHE Senior Director of Academic Pathways and Innovation
Via email

Dear Dr. Rasmussen,

Thank you for the opportunity to provide written comments on the proposed Bachelor of Science in Nursing (BSN) completion degree at Aims Community College.

UNC fully supports a goal of meeting workforce demand and of providing students with education that will assist them in growing in their chosen career field. In particular, we agree that it is important to offer high quality, affordable nursing degrees in the Greeley community and Northern Colorado region. We value our existing collaborations with Aims Community College and fully understand that this partnership helps to create an educated workforce for our region. We are also aware that it is no longer atypical for community colleges to offer the education needed for registered nurses to attain a bachelor's degree and that therefore Aims Community College's request is not anomalous. Given this we are prepared to adjust the portfolio of programs offered by UNC's School of Nursing if the Aims Community College BSN is approved.

That said, and as we discussed over Zoom, we do not believe the proposal fulfills the criteria set forth in CRS 23-71-102(1)(b)(II)(B). We also do not believe it will not necessarily increase the number of registered nurses in the workforce or increase the number of nurses with a BSN.

To better situate our comments, we would like to provide some background on our own nursing programs before addressing the specific proposal from Aims Community College.

Undergraduate Nursing Programs at the University of Northern Colorado

The University of Northern Colorado (UNC) currently offers a BSN emphasizing required baccalaureate competencies in research, leadership, and public health (topics that are not typically covered as part of an associate degree in nursing (ADN)). Our BSN degree currently enrolls students in three program formats:

- a traditional, 4-year program designed for undergraduate students who wish to major in nursing as their initial undergraduate credential (72-100 students/year). Students in this program receive licensure as registered nurses along the way to their BSN degree.
- a second-degree program designed for students who already hold a bachelor's degree in a field other than nursing and now wish to earn a nursing credential (17-36 students/year).

- an RN-to-BSN completion program designed to enable students who are pursuing or have completed an associate degree in nursing (ADN) to complete a BSN in just two to five semesters after completion of the associate degree depending on which pathway they choose (25-30 students/year). Pathways are described below.

Our residential programs (the first two bulleted items above) emphasize in-person instruction, though some didactic coursework is also available in a hybrid format. Our RN-to-BSN completion program (the third bulleted item) is offered through our extended campus with all didactic coursework online. Clinical education is completed in person in all programs.

Although UNC's RN-to-BSN completion program is open to any student, 95% of the enrollments in each annual cohort are ADN students from Aims Community College. We offer these students two main pathways:

1. a *dual enrollment pathway* through which students enrolled in the ADN program at Aims Community College can complete most of their BSN coursework alongside their ADN coursework. Students who pursue this option are able to complete the BSN more quickly (the final 12 credits can be completed in two semesters after completion of the ADN). They also benefit from our [UNC-Aims Cooperative Agreement](#), which allows any student enrolled in 12 credits at Aims Community College to take one course of up to 5 credits at UNC for free. And they have access to UNC advising support and facilities, even while taking classes exclusively at Aims Community College through the [Aims2UNC](#) program.
2. a *stackable enrollment pathway* for students who choose to complete their ADN first, and then enroll and complete the 30 credits of the BSN completion program. This pathway allows students to work as Registered Nurses for a few years and then return for their BSN, or to work as RNs while completing their BSN. They can complete their BSN in 5 semesters.

Because the proposed BSN degree at Aims Community College is also designed as a completion program, it would compete directly with our RN-to-BSN program.

Specific Comments on Aims Proposal

With respect to the Aims proposal, we would like to make sure the Commission is aware of three points:

1. Regarding workforce and student demand (Criteria I from the statute cited above) *it is important to recognize that the proposed BSN completion program at Aims Community College will not increase the number of RNs educated annually in the state.* The proposal documents the demand for registered nurses, highlights the fact that BSNs are required for employment in some specialized areas of nursing, and correctly notes that RNs who *also* hold a BSN qualify for higher pay at some institutions. This makes a BSN degree attractive for students, as well as for potential employers who offer specialized nursing care requiring a BSN credential or are prepared to pay the higher salary expected by RNs who also hold a BSN degree. However,
 - a. The *existing* clinical ADN program at Aims Community College leads to licensure as an RN, which is the credential required to staff hospital and other health care settings. Aims Community College is not proposing to expand the number of students in the clinical arm of

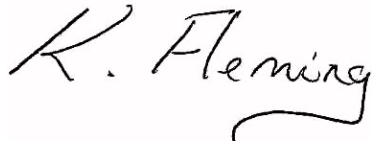
- their associate degree program, and resources devoted to offering a BSN degree will not be available to offer additional seats in the ADN program.
- b. A completion program at Aims Community College is not necessary to meet student or workforce demand for BSN degrees. UNC has the capacity to serve many more students in our own BSN completion program, and as noted above, 95% of the students in our program have either completed or are currently enrolled in the Aims Community College ADN degree. Hence at best, the proposed program would change where students receive their BSN. It would not increase the number of RNs or necessarily the number of BSNs in the state.
 - c. Should the commission decide to approve Aims Community College's proposal, UNC will likely need to discontinue our own BSN completion program due to low enrollment – Aims Community College and UNC would be competing for the same students.
2. The Aims Community College proposal also emphasizes the advantages to students in terms of cost (Criteria III from the statute cited above). UNC cannot compete with community colleges on tuition, and Federal financial aid rules do prevent Aims Community College students who chose the dual enrollment pathway from receiving financial aid at both Aims Community College and UNC concurrently. However
- a. *Aims Community College students who choose the dual enrollment pathway complete their degree in a shorter timeframe and receive a tuition waiver for one UNC course each term (a total of 12 credits), and hence must only pay for approximately 9 additional credits from UNC while dually enrolled, based on the standard plan of study.* Once students complete their ADN, they are eligible to receive financial aid for their final four courses (12 credits) at UNC.
 - b. Students who choose the stackable pathway are eligible to use federal financial aid for all of their BSN coursework at UNC, since they are enrolled in one institution at a time. Students who choose this pathway can work as RNs either prior to or during their BSN coursework, benefitting immediately from their ADN/RN credential in terms of workforce readiness, and potentially reducing the amount of financial aid and hence debt they must incur to complete the BSN credential. This pathway also exemplifies the goals of Senate Bill 22-192 and the three-state IES Credential As You Go grant in which CDHE is an active participant.
3. Aims proposes to include special emphasis on gerontology and behavioral health, with a particular focus on behavioral self-care for practicing nurses themselves. However, this does not significantly distinguish their proposed BSN completion degree from any of the undergraduate nursing programs at UNC (Criteria IV of the statute cited above). Providing a distinctive BSN degree is challenging in any case, since the accreditor-required outcomes are specific and leave little room for variation. And content relevant to gerontology and behavioral health is embedded across coursework in all of UNC's nursing degree programs, even if not explicitly pulled out as specific emphasis of the RN-to-BSN completion program. Most importantly,
- a. The credential students would receive from the proposed program at Aims Community College - a BSN - is *identical* to the credential students currently receive from the existing BSN completion program at UNC.
 - b. A successful BSN degree completion program is currently offered by UNC.

If a goal is to increase the number of registered nurses in the state, it might make more sense for Aims Community College to devote resources to increasing the number of students served by its ADN program. All of those students would be eligible to enroll in UNC's BSN completion program

which is already designed and delivered in close partnership with Aims Community College, and which has the capacity to serve more students.

But let me reiterate, UNC enjoys an amicable working relationship with Aims Community College and will continue to partner with them to ensure students have access to high quality bachelors and graduate level degrees whatever the commission decides.

Sincerely,

A handwritten signature in black ink that reads "K. Fleming". The signature is written in a cursive style with a prominent flourish at the end of the word "Fleming".

Kirsten Fleming, Ph.D.
Provost and Executive Vice President for Academic Affairs
University of Northern Colorado