



August 8, 2024

Robert Weinman, RN
Chair, Wisconsin Board of Nursing
Wisconsin Department of Safety and Professional Services
Madison, WI 53708-8935

Dear Chair Weinman:

We appreciate the work members of the Board of Nursing (BON) and staff from the Department of Safety and Professional Services (DSPS) have put into amending administrative rule N 6. We also appreciate the board's reconsideration of N6.02 (13), the definition of unlicensed assistive personnel (UAP). However, we have serious concerns about efforts to limit delegated acts to individuals who are at least 18 years of age. Specifically, this section of the rule will have a significant, negative impact on our health system, patients, and our Certified Nursing Assistant youth apprentices if enacted as written.

SECTION 4. N 6.02 (13) is created to read:

(13) "Unlicensed Assistive Personnel (UAP)" means any person who is not licensed under ch. 441, Stats., and who is at least 18 years old to whom nursing tasks or activities may be delegated and has received the appropriate education and documented training required to perform the delegated acts.

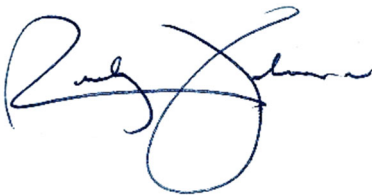
Currently, 16 of 50 youth apprentices at UW Health are under the age of 18, credentialed, and working as CNAs at University Hospital, East Madison Hospital, and the Rehab Hospital. In our opinion, the proposed language will eliminate much of the learning and work-based experiences benefitting these young people, while reducing the important role they play in patient care. While the effect of limited patient care will be felt immediately at the three facilities where they work, the longer-term effect of this section of the rule would be to slow the progress these young employees can make on our innovative career pathway to becoming registered nurses.

Leaders at UW Health have gone to great lengths to address the ongoing workforce shortage that is gripping our health system as demand for our services grows substantially each year. One way we have done that is by seeking to draw younger candidates into the health care sector and provide them the support necessary to set them on the path to a rewarding career in nursing. To date, 32 UW Health employees are enrolled in our, first in the United States, RN registered apprenticeship program, offered in partnership with Madison College, and 100 percent of those students came from entry-level positions at our health system. In fact, all of them started as CNAs.

As you consider changes to N 6, we ask that the BON forego the age requirement and allow health systems like ours to determine hiring and delegation eligibility. Doing so will support our continued efforts to recruit and retain the health care workers of today and tomorrow.

Thank you for your consideration. Please don't hesitate to let me know if you have any questions or concerns regarding this request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rudy Jackson', with a large, stylized flourish at the end.

Rudy Jackson, DNP, MHA, RN, CENP

SVP, Chief Nurse Executive

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