

To Karynlee Harrington and the Board Members of the Maine Health Data Organization,

As patient and public health advocates, the direct care nurses of the Maine State Nurses Association (MSNA) believe that the public is entitled to transparent information regarding registered nurse staffing in Maine Hospitals. Therefore MSNA opposes the decision to waive any reporting requirements related to nursing care.

The primary role of hospitals is to provide sufficient numbers of qualified registered nurses around the clock to directly provide safe, therapeutic and effective nursing care. The importance of the constant vigilance and skilled surveillance provided to patients by registered nurses in relation to patient safety and health outcomes cannot be overstated. The Code of Federal Regulations specifies there must be supervisory and staff personnel for each department or nursing unit to ensure, when needed, the immediate availability of a registered nurse for bedside care of any patient. In addition, a registered nurse must supervise and evaluate the nursing care for each patient and the hospital must ensure that the registered nursing staff develops, and keeps current, a nursing care plan for each patient.

Therefore, as advocates for our patients, our community and our profession, MSNA encourages the MHDO to explore expanding its data collection to include an unbiased, transparent publicly available reporting system that includes the actual number of patients assigned to each registered nurse to supplement the current reporting requirements of acute care and critical access facilities in Maine.

MSNA view the current requirements as a place to build from. This would build public confidence that Maine hospitals are staffed with sufficient numbers of registered nurses required to meet individual patient needs for nursing care. Registered nurse to patient ratios are highly correlated with nursing and patient outcomes in the peer-reviewed scientific literature.

We are concerned that the MHDO is considering the elimination of minimum reporting requirements at a time when the public is entitled to meaningful staffing data as it relates to a hospital's obligations to plan for the provision of patient care in the community. It is our hope that the MHDO would consider exploring ways to collect additional unbiased staffing data that can be validated and used as a basis of comparison of Maine's hospitals and health care facilities.

If the MHDO would like to learn more about ways to strengthen data collection regarding the standards of nursing care, please feel free to contact me at any time.

Sincerely,



Cokie Giles, RN, President MSNA. Council of Presidents National Nurses Organizing Committee

c.c. MSNA Board of Directors, Maine Board of Nursing