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February 26, 2026

David Hamilton
Deputy Commissioner
New York State Education Department
Office of Professions
89 Washington Avenue
Albany, NY 12234
regcomments@nysed.gov

RE: Degree Requirements for Registered Professional Nurses (EDU-52-25-00015-P)

Dear Deputy Commissioner Hamilton:

On behalf of our member nonprofit and public hospitals, nursing homes, home health agencies and other healthcare providers, thank you for the opportunity to comment on the proposed regulations to clarify Degree Requirements for Registered Professional Nurses (EDU-52-25-00015-P).

SED promulgated these regulations because the Board of Regents determined further clarification was needed regarding the degrees that meet the definition of "baccalaureate or higher nursing degree" and exemptions.

HANY supports the proposed regulations, which reflect the intent of the original and chapter-amended legislation. We appreciate that SED is providing these clarifications now, giving nurses and human resource leaders several years to prepare for the requirement to take effect in 2030.

HANY supports "BSN in 10" because a better educated nursing workforce adds value for patients and hospitals. Research shows hospitals that increased their proportion of nurses with Baccalaureate of Science in nursing degrees over time had significantly reduced odds of risk-adjusted mortality, seven-day readmissions, and 30-day and shorter lengths of stay.ⁱ

Again, thank you for the opportunity to comment on these proposed regulations. We look forward to a continued partnership with SED to support New York's nurses.

Sincerely,



Kathleen Rauch, RN, MSHQS, BSN, CPHQ
Vice President, Quality Advocacy, Research and Innovation and Post-Acute Care

ⁱ Lasater, K., Sloane, D., McHugh, M., Porat-Dahlerbruch, J. and Aiken, L.
(June 14, 2021) Research in Nursing & Health. Jun 14;44(5):787-795. doi: [10.1002/nur.22163](https://doi.org/10.1002/nur.22163)