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August 8, 2024

Robert Weinman, RN  
Chair, Wisconsin Board of Nursing  
Wisconsin Department of Safety and Professional Services

Dear Chair Weinman,

The Wisconsin Hospital Association, the Wisconsin Organization of Nurse Leaders and our members appreciate the Board of Nursing's work to update administrative rule N 6, relating to delegated acts. We also appreciate the board's reconsideration of N6.02 (13), the definition of unlicensed assistive personnel (UAP).

While we do not oppose adding a definition to the chapter, we do have concerns with the unintended consequences of creating an age benchmark of at least 18 years of age. Hospitals and health systems are active partners in training programs and support employees, high school students and community members, some of whom are younger than 18 years old, to progress through career pathways which very often begin in entry level positions as UAPs.

At an operational level this change would not allow for certified nursing assistants (CNAs) under the age of 18 to be delegated tasks by RNs, which is a routine shift need. This would impact the ability of nurses, CNAs and other members of the team to function to the top of their education, training and experience. While CNAs are the profession that first comes to mind, UAP can include roles such as patient safety attendants, feeding assistants and patient safety companions.

Proposing that UAPs must be at least 18 years old would disadvantage health care in the ability to grow the workforce through partnerships with the Wisconsin Department of Workforce Development, and high schools to provide Youth Apprenticeships. The Wisconsin Technical College System and the UW system would also be impacted, as their CNA programs are targeted at high school students at least 16 years old and are a critical part of the pipeline into nursing.

We respectfully request the Board of Nursing to forego an age requirement. Such an age requirement would negatively impact an already insufficient candidate pool for frontline technical positions on patient care teams and restrict the ability to allow high school students exposure and opportunity to future careers in health care.

Thank you for your thoughtful consideration of N6, and for your appreciation of the impact such rule changes have on potential members of the health care workforce, on hospitals and health systems, and on our partners in education and workforce development.

Sincerely,

/s/

Ann Zenk RN BSN MHA  
Sr. Vice President Workforce & Clinical Practice  
Wisconsin Hospital Association

/s/

Dennise Lavrenz RN MBA CENP  
President  
Wisconsin Organization Nurse Leaders

cc: Brad Wojciechowski, Executive Director, Wisconsin Board of Nursing  
Sofia Anderson, Administrative Rules Coordinator, Department Safety and Professional Services