

Good morning. I am Allison Muth, a Senior Attorney with Veterans Education Success. We work on a bipartisan basis to advance higher education success for veterans, service members, and military families, and to protect the integrity and promise of the GI Bill® and other federal education programs.

Nursing programs are required to maintain certain pass-rates on the NCLEX exam as a measure of program quality, but schools can effectively manipulate their NCLEX pass rate by removing from their cohort of test takers students who complete all academic requirements of the program but do not achieve a high enough score on the school's practice or exit exam. This allows schools to maximize enrollments and revenues by admitting large numbers of applicants but avoid the risk of students not learning enough to pass the NCLEX.

Standardized tests, such as the HESI exam, are used by nursing programs to assess student preparedness for the NCLEX. Some programs, however, go so far as to require students to get a certain score on the test as a condition of graduation. When such exams are a condition for graduating from a program, the tests are referred to as "high-stakes exams," because *everything is on the line for the student*. Whether the student can take the NCLEX or get their degree depends on if the student gets the score set by the school.

Last year, the maker of the HESI exam stated in a [white paper](#): "An exam score that alone prohibits student progression or graduation or that is required for authorization to sit for a licensure exam is considered high stakes and not recommended".

The National League for Nursing developed [Fair Testing Guidelines](#) in response to its concerns about high-stakes exams.

ACEN says it does not endorse the use of high-stakes exams, stating in its [2021 Report to Constituents](#), "The use of high-stakes testing for students' progression or completion of a nursing program is not a best educational practice."

Yet, ACEN continues to accredit programs that utilize these high-stakes exams, and students are suffering the consequences. A military spouse attending a program accredited by ACEN contacted us for help. She had spent \$40,000 on a program, hired babysitters, and made a long commute to attend training, all while her husband was deployed. Finally she made it to the end of the program and passed all the requirements, except she did not receive the score her school required on the HESI exam, so she was not allowed to graduate from the program or take the NCLEX. Notably, her score on the HESI exam exceeded the requirements that the school had when she enrolled, but the school increased the necessary score after she enrolled.

The use of high-stakes exams in nursing programs is an unfair practice that harms students and protects schools from regulatory oversight. We urge the Department to examine ACEN's and other nursing accreditors' policies with respect to high-stakes exams.

Thank you for the opportunity to comment today.