



November 2, 2011

Dear School Nurses:

We are writing to inform you of an issue of critical importance regarding school nurse certification and requesting that you immediately express your concerns to the NJDOE about the implications of the recommendation. Please read this information carefully so that you can carefully articulate your concerns.

The Education Transformation Task Force was established by the Governor in April 2011 to address two issues: to review all statutes and regulations that affect public education, and to recommend a new accountability system that grants more autonomy to schools while maintaining strict accountability for student achievement, safety, and fiscal responsibility. The Governor released the Initial Report of the Task Force, which is available at <http://www.nj.gov/education/news/2011/1007taskA1.pdf>. I strongly suggest that you review the report in its entirety with special attention to page 40.

In the Education Transformation Task Force's Initial Report, dated September 12, 2011, the Task Force recommends **a change to the school nurse/non-instructional educational services endorsement**. Currently, registered nurses seeking school nurse certification in New Jersey have two options: school nurse/instructional which allows the nurse to teach in areas related to health in addition to serving as a certified school nurse; or, school nurse/non-instructional which requires the same preparation as the previous title except that nurses are not required to take a methods in teaching course and are not required to complete a classroom instruction field experience. Nurses taking the non-instructional route may still use the term "school nurse" as prescribed in N.J. S.A. 18A:40-4.1 and 3.3 but they may not teach health education. For more information on certification, please go to: <http://www.njssna.org/resources/certification/>.

The proposed changes to the school nurse/non-instructional route would effectively permit any registered nurse with a Bachelor's degree and two courses, public health and human growth and development, to secure the endorsement and use the title "school nurse." Nurses opting for this process will not be required to enroll in an institution of higher education to take the two required courses as they may have been taken as part of their undergraduate education. In essence, **this recommendation eliminates ANY requirement for school-based practicums or field experiences, requires no courses in school law or policy, and does not require that candidates even work in a school prior to certification**. Yet, completion of this process will enable the nurse to use the protected title "school nurse" without comparable preparation to those applying for the school nurse/instructional

endorsement. It will create a more differentiated system than currently exists with individuals with little or no preparation beyond basic nursing education permitted to use the title “school nurse” and be responsible for supervising other healthcare professionals working in a school.

To complicate this matter, the NJDOE proposed changes to N.J.A.C. 6A:16 that would change the definition of a “supplemental” nurse from a registered nurse to simply “nurse,” therefore allowing the use of licensed practical nurses (LPNs) in the school setting. Heretofore, LPNs were only permitted to provide 1:1 services to students with special needs as dictated by the IEP. This proposed change would permit LPNs to function in the exact same manner as registered nurses now working under the supervision of the certified school nurse. In addition, some school districts have attempted to stretch the definition of complex, originally intended to be two or more buildings on the same campus, to two or more buildings in the same town or district regardless of distance between them. The same regulations would remove the requirement that the Nursing Services Plan (NSP) be submitted to the Office of the Executive County Superintendent. The NSP would still require approval by the local Board of Education. While the proposed regulations have not yet reached adoption, once the regulatory review process is over, the NJDOE will resubmit the proposed changes to the State Board of Education for approval. These changes, and others that may be suggested by the regulatory review, may significantly impact the future of school nursing in New Jersey.

Advocates for these changes cite the need for a larger school nurse applicant pool. This same claim was the impetus for the creation of the non-instructional certificate in the first place. At a time when certified school nurse positions have been eliminated in districts or reduced to part-time status, and when hospitals and medical facilities are closing or cutting personnel, there is little evidence that this shortage exists. The shortage may be explained by poor salaries and benefits due to budget cuts as well as services provided by health staffing agencies where assignments may be inconsistent or paid at an hourly rate lower than similar care in other healthcare settings. Evidence exists that when full-time certified school nurses retire or leave a district, they are often replaced with several part-time nurses, some of whom are not certified. In one scenario, a nurse with more than 15 years of experience was let go and told she could be rehired by an agency now under contract to the district to provide school nursing services. This nurse would be providing the exact same services as the year before; however, without seniority, tenure, benefits, and her pension! These examples are but the tip of the iceberg. It is important to note that nursing services to non-public schools have been delivered by registered nurses, many of them hired by Educational Services Commissions, Special Services School Districts, or private healthcare agencies.

Certified school nurses serve as the bridge from public health to education and are well-educated in how schools function, the laws and regulations that support school health, and the needs of students and their families. School nursing is recognized as a sub-specialty of nursing and, in fact, has its own *Standards of School Nursing Practice*, published jointly by the ANA and NASN. We must defend the role of the certified school nurse and the need for differentiated preparation in order to work in a school environment. We must do a better job of articulating what we do and how the certification process helps us do it better! We must protect the professional integrity of school nursing practice.

Here is the actual recommendation as it appears in the taskforce's report:

N.J.A.C. § 6A:9-13.4 School nurse/non-instructional.

“To be eligible for the standard educational services certificate with a school nurse/non-instructional endorsement, a candidate shall hold a current New Jersey registered professional nurse license issued by the New Jersey State Board of Nursing, hold a bachelor's degree from a regionally accredited college or university, hold current cardiopulmonary resuscitation (CPR) and automated external defibrillators (AED) certificates and complete either a Department-approved college curriculum for the preparation of school nurse/non-instructional or a program of studies, minimum of 21 credits that includes study in [nine separate areas] . . . Human and intercultural relations. Studies designed to develop understanding of social interaction and culture change, including courses such as the following: urban sociology, history of minority groups, intergroup relations, and urban, suburban and rural problems. . . . School law including legal aspects of school nursing..”

The Department and State Board should seek to limit the breadth of the “program of studies” from nine separate areas to two – study of public health nursing and human growth and development. This change will provide districts and schools with larger applicant pools for their non-instructional school nurse positions.

Here is a description of the work of the taskforce, taken from the report (emphasis added):

“With regard to regulatory reform, the process of reviewing each chapter of Department regulation, and each underlying statute, will continue through the end of year. The Task Force’s team of lawyers and educators will continue to evaluate the extent to which each regulation exceeds federal mandate, State law, or case law. If the regulation exceeds the underlying authority and does not serve to improve student achievement, operational efficiency, or fiscal effectiveness, then the Task Force will recommend its repeal. The Task Force will collaborate with Department leadership and staff to prepare revised chapter of code which reflect this new regulatory perspective and which shall be proposed to the State Board of Education for adoption. In addition to this review of regulations, the Task Force is also charged with reviewing the statutes supporting these administrative regulations and making further recommendations. The recommendations derived from these streams of work will be shared in a final report submitted to the Governor by December 31, 2011, at which point the Task Force will expire.”

We urge you to send your suggestions and thoughts to the Task Force via email (regreform@doe.state.nj.us) or postal mail (Education Transformation Task Force, c/o Department of Education, 100 Riverview Plaza, PO Box 500, Trenton, NJ 08625). This is a critical time for certified school nursing in New Jersey. Watering down this endorsement is the first step in changing the face of school nursing in New Jersey.

In your letter to the taskforce, please emphasize the following key points:

- There should be no changes in the current requirements for either endorsement. Any possible changes to school nurse certification requirements should be considered by a representative group of certified school nurses and school nurse educators.
- Certified school nurses provide specialized care in an independent non-healthcare setting and require specialized education to do so effectively and competently.
- Certified school nurses are educated to address the link between health and learning and are critical to the academic success of students with health conditions such as asthma, severe allergies, diabetes, sickle cell anemia and obesity.
- Certified school nurses are guided by specific standards of practice that are not part of basic nursing education.
- Certified school nurses serve as educators, counselors, caregivers, case managers, and community and family liaisons.

Please note that the State Board of Education will hold a meeting at the NJEA Convention on Thursday, November 10, 2011 at 3pm in Room 202 in the Atlantic City Convention Center. Members of the NJSSNA Board plan to attend this meeting and share their concerns with the State Board. We welcome your attendance and support at that session. Should you want to speak that day, NJSSNA Board members will meet outside Room 202 at 2:30 pm. If you cannot attend, please be sure to send your comments to the taskforce.

Thank you, in advance, for your support of certified school nurses and to the children and families they serve!

Respectfully,

Brenda Porter, President, NJSSNA

Linda Morse, Executive Director, NJSSNA

School Nurses...Leading, Teaching, Caring!