

March 10, 2021

To: Senator Roegner and Senate Government Oversight and Reform Committee

Now more than ever as a result of the COVID-19 pandemic, opioid epidemic, and the rise in childhood obesity, highly qualified Ohio Department of Education (ODE) licensed School Nurses (LSN) are paramount to Ohio school children achieving optimal health, wellbeing, and academic success. School nursing practice requires advanced knowledge and skills to address the complex health needs of students within a school community setting ([ANA/NASN, 2017](#)). These skills are attained through a minimum of a baccalaureate degree in nursing and validated by specialized certification in school nursing ([IOM, 2011](#); [NASN, 2021](#)). School Nurses are uniquely positioned to meet the needs of Ohio's students. Often the only healthcare provider with ready access to the students, School Nurses address the social determinants of health, such as income, housing, transportation, employment, access to health insurance, and environmental health which cause approximately 80% of all health concerns ([NASN, 2016](#)). Failure to have LSNs who are educated with specialized knowledge, skills, and dispositions will create further disparities in health and education amongst vulnerable children.

Ohio School Nurse Educator's Concern

The Senate amendment of HB 442 just prior to passage was disheartening and left minimal opportunity to discuss the topic or concerns. School Nurses are currently working tirelessly to support their students and schools during this pandemic and were blindsided by this new law. This testimony reflects conversations that were necessary before the swift passage of HB 442 and now HB 6.

Ohio School Nurse Educators from universities around the state have convened to express the concern regarding HB 442's consequences and its relation to HB 6's amendment to Sec 3319.221. The amended law creates a new pathway allowing a registered nurse (RN) to *purchase* a "registration" as a School Nurse from ODE, rather than earn a "license" and title of School Nurse from ODE. The ODE pupil services license for School Nurses is NOT equivalent in education, role, or scope and standards of practice to the Ohio Board of Nursing (OBN) RN license and is NOT a redundant license.

Ohio School Nurse Educators are asking for the following:

- An amendment to HB 6 that reinstates Sec 3319.221 definition of School Nurse as stated prior to passage of HB 442 (in the same manner School Psychologist and Guidance Counselors were removed from 442).
- Only RNs earning the ODE pupil services license use the protected title of School Nurse.
- Only ODE licensed School Nurses are eligible for classification as certified/credentialed staff (standard prior to passage of HB 442)
- Pathway for Registration as a School Nurse be removed. Districts can currently hire non-ODE licensed nurses, as well as contract with public health departments, hospitals, ESCs, and private agencies to provide health services.
- Reinstatement of a district's decision making ability regarding whether they will require the RNs to hold the ODE School Nurse license and be regarded as highly qualified, certified staff.

ODE Pupil Services School Nurse License Educational Preparation

A School Nurse is critical to the health of every child, every school, every community in Ohio. Each child in Ohio represents our future and an ODE licensed School Nurse is critical to ensuring the whole child remains at the center of Ohio's educational strategic plan by promoting equity, safety, and academic outcomes of each and every child. School nursing practice is defined/guided by the [National Association of School Nurses \(NASN\) Scope and Standards of Professional School Nurse Practice](#), [NASN 21st Century Framework for Professional School Nursing Practice](#), and the [Centers for Disease Control \(CDC\) Whole School, Whole Community, Whole Child \(WSCC\) model](#). The educational preparation for the School Nurse license requires successful completion of a rigorous post-bachelor's program that supports the advanced nursing practice needed to practice in the school setting while supporting [Ohio's Whole Child Framework](#). Ohio's school nurse preparation programs provide the critical content knowledge and skills specific to school nursing, a specialty practice area of community/public health nursing.

- School Nurses practice autonomously in a non-healthcare setting to provide case management and care continuity to address the complex needs of Ohio students, families, communities, and school district employees.
- Ohio School Nurses provide more than first aid [bandaids and ice packs].
- School Nurses have a responsibility to provide for the health, well-being, and safety of individual students, as well as support their academic achievement as part of interprofessional school support teams.
- School Nurse preparation includes a comprehensive educational foundation encompassing child development and health, health management within school systems, educational collaboration related to student evaluation and intervention services, leadership, and health education. Completion of a supervised field experience/internship in the school setting is also required to verify the nurses have met the [NASN Professional Standards](#) and the [Ohio Educators Standards](#).
- School Nurses are prepared to be “leaders who bridge health care and education, provide care coordination, advocate for quality student-centered care, and collaborate to design systems that allow individuals and communities to develop their full potential” ([NASN Board of Directors, 2017](#)).

Consequences of the passage of HB 442 which rescinded ORC 3319.221 and the current HB 6 amendment to ORC 3319.21

HB 442, rescinded [ORC 3319.221](#) to create a new option for the professionals categorized as pupil services providers (SLP, Aud. PT, OT, Social work), including School Nurses. School psychologists and school counselors were removed from HB 442 language, as they require school-specific education to obtain their ODE license. Prior to HB 442, School Nurse was defined as a Registered Nurse with a bachelor’s degree who had completed a post-bachelor’s school nurse preparation program from an ODHE approved university. School Nurse was a protected title to identify those nurses having completed this school nursing-specific educational requirement and earned the ODE [educational] license. Ohio School Nurse Educators are aware HB 442 did not remove the option of earning the ODE School Nurse license, but instead allows any RN with a bachelor’s degree (HB 6) to register with ODE and be recognized as a School Nurse and be afforded the benefits of that title. RNs completing the ODE “registration” option will lack the essential skills and content knowledge required to ensure the health and safety of students and the school community.

The ODE registration option is problematic for the health and safety of Ohio students for the following reasons:

- The School Nurse role requires specific educational preparation, in addition to the OBN nursing license, to effectively support the health, safety, and academic outcomes of Ohio’s students.
- The ODE education license identifies the School Nurse as highly qualified.
- Nurses are required to display their credentials by Ohio law, whether LPN, RN, or APRN, as they identify a nurse’s expected level of expertise or competence. School Nurse (LSN) provides this same purpose in identifying the role and expectation of nurse preparedness in relation to the profession of education. Allowing those with an ODE registration to utilize the title School Nurse does not properly identify a nurse’s expected level of expertise or competence to the public.
- Confusion is created for schools, students, and families. “School Nurse” provides a false sense of security regarding the expected preparedness of the RN in the role when schools hire an ODE “registered” School Nurse rather than an ODE Licensed School Nurse.
- School districts were able to employ nurses without the ODE school Nurse license, as well as contract with public health departments, hospitals, Educational Service Centers (ESC), and private agencies for nursing services PRIOR to the passage of HB 442. These RNs and LPNs are typically hired or contracted at a lower compensation than a district hired LSN and are considered classified staff, not certified/credentialed. This avenue has been utilized by districts to help manage budgets over the past 5 years when [ORC 3313.721](#) was last amended to include contracted service providers.
- Ohio and national data from the [National School Health Data Set: Every Student Counts](#) indicate student health AND academic outcomes improve with a Professional (licensed) School Nurse. Students have improved attendance rates and increased seat time in the classroom when an ODE licensed School Nurse is providing services in the school, when compared to RNs without the ODE license, LPNs, and Unlicensed Assistive Personnel (UAP), such as secretaries or health aids. (See supporting documents below)

- Many districts employ just one nurse. In districts employing an RN with the ODE registration, there will be NO FORMAL TRAINING prior to the position and NO GUIDANCE to acclimate to the position. This is a liability to the RN and school district. It also creates a safety concern for the students.
- Professional School Nursing practice is outlined in the [NASN/ANA Scope and Standards of School Nurse Practice](#) and the [NASN Framework for 21st Century Professional School Nursing Practice](#). Nurses or personnel hired into a position “regarded as” a School Nurse will be held accountable to these standards of practice in a court of law. ODE licensed School Nurses are knowledgeable and prepared to practice according to these standards.
- Many nurses in Ohio schools are hired and supervised by non-nurses. This does not allow for the critical analysis of nursing experience prior to hiring or supervision of nursing practice after hiring for the nurses with ODE “registration.”
- There are many laws and practices specific to working in the school setting that are NOT addressed in a BSN program and are NOT required content knowledge for an RN license.
- Passing the NCLEX exam to earn an OBN RN license indicates one has been prepared as a generalist nurse and has met the minimum competencies to practice as a generalist RN.
- Community/public health nursing concepts are not included as competencies evaluated in the NCLEX RN licensing exam.
- Due to COVID-19 exceptions, there are RNs, with a bachelor’s degree, currently practicing in Ohio who have not passed the NCLEX. These RNs are eligible for the ODE registration option as of 4/12/21.
- There is no requirement for nursing experience prior to completing the ODE “registration” process.
- RNs completing the ODE “registration” option will lack the essential skills and content knowledge required to ensure the health and safety of students and the school community.

Ohio Board of Nursing RN License

The Ohio Nurse Practice Act ([OAC 4723](#)) strictly dictates nursing practice in Ohio, including the use of nursing titles and initials. The primary purpose of a nursing license is to protect the health, safety, and welfare of the consumer public—not the profession. Nursing titles/credentials are primary to the OBN’s role in protecting the public. Nurses must identify themselves by credentials as a matter of public safety, as “nurse” can be LPN, RN, APRN (CNP/CNS/CRNA/CNM).

Ohio Department of Education Pupil Services: School Nurse License

A professional educator’s license is granted to those applicants having met a state’s licensure requirements. The Pupil Service: School Nurse license indicates an expected level of advanced nursing knowledge and competency for practice in a school setting. This is about protecting Ohio’s students and respecting the value licenses and credentials play in public safety.

Dual Licensing of Ohio School Nurses

Dual licensing and certification serve to protect the public and is a widely accepted standard in professional practice across disciplines.

- We require educators to be licensed in their area of specialty. Teachers with credentials to teach music are not qualified to teach math, although they are both licensed educators. Teachers who provide reading support are required to have a reading specialist endorsement of their teaching license.
- We require medical professionals to be licensed in their area of specialty. We expect graduates of medical school who have earned a MD license to obtain specialty training/education and certification/licensure in their chosen field of practice, although they are licensed physicians.
- We require RNs with advanced nursing education obtain an additional license APRN (CNP/CNS/CRNA/CNM) to practice as an advanced practice nurse. These nurses must maintain dual OBN licensure and national certification by specialty area.

The ODE Pupil Service: School Nurse license is NOT a duplicate or redundant license in relation to the OBN RN license, as they are NOT equivalent.

The new ODE registration option represents an attempt to deregulate school nursing practice in Ohio and promotes the devaluing of school nursing expertise. This leaves the health and safety of the children in Ohio schools in jeopardy. Professional standards serve a purpose, as do licensure and certification. We are asking you to **ACT NOW** to protect the health and safety of Ohio's students and promote the professional standards that the licensed School Nurse represents. If 2020 has taught us anything, it is our hope that it has put a spotlight on the need for highly educated and prepared health professionals in public health settings, including schools.

Submitted Respectfully,

Ohio School Nurse Educators

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Attachments for review:

- The OASN Roles document provides further evidence of the specialized knowledge and skills required for a School Nurse and the consequences of HB 442 and HB 6 on ORC 3319.221 will have on school nursing practice and student health/academic outcomes.
- Responses from a national blog regarding the nursing experience as a new school nurse. These are nursing voices that provide powerful testimony to the requirement of having prepared, professional School Nurses in Ohio schools.

Licensed School Nurse (LSN) Impact of HB 442 and HB 6

Licensed by the Ohio Department of Education (ODE). ODE licensure requirements include: a Registered Nurse (RN), a Baccalaureate degree, and completion of an ODE approved post-baccalaureate curriculum of study in school nursing.

Positive Attributes	Detracting Attributes
<p>Ohio Revised Code 4723.01 defines the RN scope of practice that is regulated by the Ohio Board of Nursing. Ohio Revised Code 3319.221 defines School Nursing. Requires nursing continuing education for renewal of license. The LSN is an Independent practitioner not requiring direction by another health professional. Educated in critical thinking and judgment skills to develop a plan of care appropriate and effective for the school setting.</p> <p>LSN licensure requires specific education of the practice of nursing in the school setting, including:</p> <ul style="list-style-type: none"> o Advanced physical assessment o Advanced mental health assessment o Development of individual health plans o Development of emergency action plans o Coordinated school health program o Advanced education in emergency preparedness o School nurse standards and scope of practice o School law and impact on health care o Special Education regulations <p>Therefore, the LSN is educationally prepared to:</p> <ul style="list-style-type: none"> o Write educational goals, o Contribute to Individual Assessment Team (IAT), 504 Plan, and Evaluation Team Report (ETR), Multi-factored Evaluation (MFE) or Individual Education Plan (IEP) process. o Act as a liaison between health and academic success o Contribute towards recommendations of home tutoring needs o Bridge from health plan to educational process/learning/plan o Teach independently in the classroom aligning with education standards o Participate effectively in school wellness and emergency preparedness o Recognize Epidemiological patterns of symptoms, the implications and develop a plan of intervention for the school community. o Assess and manage student health to support the education process and enhance academic success o Keep students in school and learning <p>Can independently assess the health and health care needs of students. Can plan, implement, evaluate and modify a plan of care based on student assessment. Can delegate nursing tasks to LPN and UAP. Can analyze, organize and interpret data and make health referrals. Collaborate and communicate with the client, family and others on the health care team. Can bill Medicaid for services provided and ETR's. Can evaluate the practice of another nurse</p>	

Registered Nurse (RN)

Various levels of education include diploma prepared nurse (3 years, no degree), Associate Degree Nurse (usually 2 years of education), BSN degree (4 or more years of college education) Diploma and Associate degree RN education does not include a community /public health course. Community/public health knowledge and competencies are NOT evaluated by the NCLEX RN licensing exam.

Positive Attributes	Detracting Attributes
Ohio Revised Code 4723.01 defines the RN scope of practice that is	Inconsistent levels of education and preparation for the role in the school setting.

<p>regulated by the Ohio Board of Nursing. Requires nursing continuing education for renewal of license. The RN is an Independent practitioner not requiring direction by another health professional. Educated in critical thinking and judgment skills to develop the plan of care. Can Independently assess the health and health care needs of patients. Can plan, implement, evaluate and modify a plan of care based on patient assessment. Can delegate nursing tasks to LPN and UAP. Can organize and interpret data, make referrals. Collaborate and communicate with the client, family and others on the health care team. Can bill Medicaid for services provided and ETR's. Can teach about health. Can evaluate the practice of another nurse</p>	<p><u>Cannot</u> hold the job title of School Nurse per ORC 3319.221</p> <p>Education <u>does not</u> include specific education in the practice of nursing in the school setting. Such as:</p> <ul style="list-style-type: none"> ● Advanced physical assessment ● Advanced mental health assessment ● Coordinated school health program ● Advanced education in emergency preparedness ● School nurse standards and scope of practice ● School law and impact on health care ● Special Education regulations <p>Therefore they are not educationally prepared to:</p> <ul style="list-style-type: none"> ● Write educational goals, ● Contribute to Individual Assessment Team (IAT), 504 Plan, and Evaluation Team Report (ETR), Multi-factored Evaluation (MFE) or Individual Education Plan (IEP) process. ● Act as a liaison between health and academic success ● Contribute towards recommendations of home tutoring needs ● Bridge from health plan to educational process/learning/plan ● Teach independently in the classroom aligning with education standards ● Participate effectively in school wellness and emergency preparedness
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National blog: School Nursing Practice

Question: How prepared were you to practice as a school nurse?

Sample of responses:

- '37 years hospital nursing and I felt I would have been just as qualified had I spent 37 years digging ditches.'
- 'After working as a nurse for 4 years in the hospital ICU, I thought I would be prepared for anything that came my way as a school nurse... well it didn't make one bit of difference; I felt like a new grad and unprepared.'
- 'In our district, we need at least 2 years outside experience as an RN before being hired as a School Nurse.'
- 'School nursing is the most challenging job I have ever had! It's all nursing professions in one. Having a good support system is key.'
- 'School nursing requires confident autonomy and requires a lot of available support from other nurses.'
- 'I never hire new grads because they were still honing their skills. Remember you are most likely the only medical person in the school. You need to make quick decisions and be ready to take over leadership, if needed.'

- ‘After 20 years as a school nurse... I wish I would’ve been more prepared related to social work or child psychology/trauma background.’
- ‘Being the sole source of medical assessments you must have very confident skills, be able to work autonomously, and deal with the politics of all the dynamics making up an educational setting.’
- ‘There are so many different things to learn as a school nurse...things you wouldn't do in another nursing job.’
- ‘I didn’t know what I didn’t know until I earned my School Nurse Certificate. I have been in the school setting for 15 years and there was so much I did not know and was not doing!’
- ‘After 5 years of practice as a Pediatric Nurse Practitioner (PNP), I was not prepared to practice in the school setting. I was very confident in my assessment skills and practicing autonomously, but school nursing practice involved many concepts and skills I had never learned in my bachelor’s RN license education, Master’s PNP education, nor multiple years of practice. The education to receive my School Nurse license was invaluable to my practice.’

Take away messages/themes:

- RN license, alone, did not provide skills and knowledge to practice in school nursing.
- Strong nursing support is needed for RN new to the school setting.
- School nursing is completely different from any other type of nursing practice.
- Nursing experience and training are essential for school nursing practice, but not enough to prepare a nurse for this specialty practice area. School nursing-specific education is needed.
- School nursing requires autonomy and confidence in nursing skills and knowledge from interprofessional topics/experience.

2018-2019 Ohio Data for for National School Health Data Set: Every Student Counts

Ohio Licensed School Nurses support student learning by returning more students back to class where they can continue to learn.

