

# 09hr\_SC-Ed\_CRule\_10-058\_pt01



Details:

(FORM UPDATED: 08/11/2010)

## WISCONSIN STATE LEGISLATURE ... PUBLIC HEARING - COMMITTEE RECORDS

### 2009-10

(session year)

### Senate

(Assembly, Senate or Joint)

### Committee on ... Education (SC-Ed)

#### COMMITTEE NOTICES ...

- Committee Reports ... **CR**
- Executive Sessions ... **ES**
- Public Hearings ... **PH**

#### INFORMATION COLLECTED BY COMMITTEE FOR AND AGAINST PROPOSAL

- Appointments ... **Appt** (w/Record of Comm. Proceedings)
- Clearinghouse Rules ... **CRule** (w/Record of Comm. Proceedings)
- Hearing Records ... bills and resolutions (w/Record of Comm. Proceedings)
  - (**ab** = Assembly Bill)                      (**ar** = Assembly Resolution)                      (**ajr** = Assembly Joint Resolution)
  - (**sb** = Senate Bill)                              (**sr** = Senate Resolution)                              (**sjr** = Senate Joint Resolution)
- Miscellaneous ... **Misc**

\* Contents organized for archiving by: Gigi Godwin (LRB) (August/2011)



Rule 10058?

RECEIVED  
SEP 15 2010  
BY:

July 22, 2010

Tony Evers, Ph.D.  
Wisconsin State Superintendent  
Department of Public Instruction  
P. O. Box 7841  
Madison, WI 53707-7841

Dear Dr. Evers:

Thank you for taking the time today to meet with me and my colleagues from the Health Occupations Division at Milwaukee Area Technical College (MATC). I fully appreciate your position and appreciate your willingness to listen.

As I mentioned, in my role as a member of the Board of Directors of the American Association of Community Colleges (AACC) I became familiar with the ongoing efforts at the national level to restrict the access to employment of Associate Degree Nurses (ADN) who have passed the national Registered Nurse (RN) exam. The enclosed article, "AACC Launches Campaign to Protect ADNs," details this national effort to undermine the ADN degree and the efforts of AACC to combat these efforts. As an educator, I am deeply concerned about these "fence them out" tactics, as I believe it will have a chilling effect on ADN programs and will adversely affect the employment opportunities in particular for nurses of color in Wisconsin. The long-term impact to our health care system, already faced with nursing shortages, will be devastating.

I urge you to consider language that is not exclusionary and that allows ADN graduates with specialized training to work in public schools in Wisconsin.

Sincerely,

A handwritten signature in cursive script that reads "Michael L. Burke".

Michael L. Burke, Ph.D.

President

C: Paul Gabriel  
Dessie R. Levy  
Dr. Nancy Vrabec

Downtown Milwaukee Campus  
700 West State Street  
Milwaukee, WI 53233-1443

Mequon Campus  
5555 West Highland Road  
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MATC.edu  
414-297-MATC



**Dauscher, Sara**

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**From:** Kammerud, Jennifer DPI [Jennifer.Kammerud@dpi.wi.gov]  
**Sent:** Wednesday, July 28, 2010 10:52 AM  
**To:** Dauscher, Sara  
**Subject:** FW: School Nurses in support from Racine

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

CRule 10-058?

-----Original Message-----

**From:** Slauson, Lori L. DPI  
**Sent:** Friday, July 23, 2010 7:46 AM  
**To:** Gallagher, Rachel A. DPI; White, Douglas DPI  
**Cc:** Kammerud, Jennifer DPI  
**Subject:** FW: School Nurses

Nurse testimony

Lori Slauson  
Budget Analyst and Admin. Rules Coordinator Wisconsin Department of Public Instruction  
P.O. Box 7841 Madison, WI 53707-7841  
(608) 267-9127

-----Original Message-----

**From:** Sue Stroupe [mailto:Sue.Stroupe@racine.k12.wi.us]  
**Sent:** Thursday, July 22, 2010 5:16 PM  
**To:** Slauson, Lori L. DPI  
**Subject:** School Nurses

Ms. Slauson,

I am sending this email in support of the proposed legislation mandating that school nurses have a bachelor's degree in nursing (BSN).

I am an advanced practice nurse who has been in the practice of pediatric nursing for over 40 years in a variety of settings - acute care hospitals, primary care, Assistant Clinical Professor Marquette University College of Nursing for 18 years, and now school nursing. I believe that I am uniquely qualified to know the educational level of nursing necessary to provide adequate care in a school setting.

I started working in schools at the request of the administration of Marquette University. I will be the first to tell you that before I set foot in an inner city Catholic School, I didn't get it. I thought I would be bored to tears - nothing but bandaids, upset tummies, and a little ice. Maybe the occasional medication. I was arrogant enough to think it would not be a good use of my skills.

It took me about 2 days to realize exactly how much trouble I was in. It was probably the hardest job I have ever had. It is not physically demanding like a hospital, but it is a constant intellectual challenge. In addition to having to have the technical skills necessary to perform physician ordered procedures, safely administer medication, provide first aid, and manage chronic illness among other things, your biggest survival skill is the ability to problem solve with few if any colleagues or support systems to help you through the process. You are not surrounded by other health professionals - you are alone. There are no stock supplies in the clean supply room when a parent forgets to send equipment; a pharmacist on call to send you the right medication when the family sends the wrong one; or a ward clerk to do all the paper work. Most likely there is just you.

School nursing is a bit like being on a religious mission - you have incredibly needful children and families whose needs you must meet with little or no money or resources. You

have to be able to use every critical thinking skill you were taught at your college or university. Without the comprehensive community health theory classes and practicums found in a BSN program, you will be lost. School nursing is so much more than bandaids and ice.

Thirteen years ago through a contractual agreement between Marquette University and the Racine Unified School District I was sent to the District to design and implement the school health program - which I did. I was given the opportunity to write the RN's job description. After my personal experience with school nursing, I insisted upon and fought for a minimum of a bachelor's degree in nursing as a condition of employment. To have anything else would have put the nurse at an incredible disadvantage. For example, when a nurse attends a student's IEP, SST, or Section 504 meeting every other school district employee at that table has a minimum of a bachelor's degree. Why would you want anything less for the registered nurse? Why would our children and their families deserve anything less?

I believe that our Associate Degree nurses do an outstanding job particularly with technical skills, but they do not have the educational preparation in community health to survive in a school setting. Practicing nursing in a school is not for the faint of heart. Last year in Racine, our 17 RNs were responsible for the over 111,000 health room visits, administration of over 50,000 doses of medication, and the performance of over 17,000 physician ordered procedures. Many of these responsibilities were delegated to unlicensed assistive personnel (also known as secretaries).

Not any nurse can be a school nurse. A school nurse needs at a minimum to have a bachelor's degree in nursing because without they will not be sufficiently prepared for this difficult area of nursing practice.

Thank you for taking the time to read this email and consider my concerns. Take care.

Susan P. Stroupe RN CPNP  
Supervisor, Health Services  
2220 Northwestern Avenue  
Racine, WI 53404  
(262) 631-7018





**Milwaukee Chapter**  
**National Black Nurses Association, Inc.**  
P.O. Box 16649  
Milwaukee WI 53216-0649  
www.mcnbna.org

c- Rule 10-058?

July 29, 2010

Lori Slauson, Administrative Rules and Federal Grants Coordinator  
Department of Public Instruction  
125 South Webster Street  
P.O. Box 7841  
Madison, WI 53707

On behalf of the Milwaukee Chapter National Black Nurses Association, Inc. (MCNBNA), I write this letter opposing the proposed ruling for SB 414.

MCNBNA was organized in 1980 by seven registered nurses that saw a need for the small population of Black nurses to become part of a professional organization. Today, it is a nonprofit organization with a membership consisting of registered nurses (Associate, Bachelors, Masters and PhD levels), licensed practical nurses, and student nurses.

MCNBNA's mission is to provide a forum for collective activities by African American nurses to "investigate, define and determine the health care needs of African Americans and to implement change to make available to African Americans and other people of color health care that is accessible and acceptable." MCNBNA provides health education for and with the community to support health promotion, disease prevention and empowerment. MCNBNA is committed to collaborative efforts with private and public agencies and organizations that share common concerns for improving the health status of all people, particularly focusing on African Americans and other people of color. MCNBNA is committed to promoting health careers / professions and providing annual scholarships and support to nursing students at all levels of entry.

As your committees review the proposed Rule on SB 414 to require "school nurses" to have a Bachelors degree in nursing to be employed, we strongly urge each of you to consider the impact of the Rule on the future of nurses (African-American) in Wisconsin. The MCNBNA believes in, encourages and supports nurses that continue to further their education for the good of our communities. We recognize that Associate Degree, Diploma and Bachelors prepared nurses all sit for the same licensure exam (NCLEX-RN). The majority of African Americans enter into the profession via associate degree programs. Associate Degree programs are more affordable and allow for individuals to sustain a livable wage.

We believe all levels of nursing embraces the "patient's" safety at the forefront of care being provided.



**Milwaukee Chapter  
National Black Nurses Association, Inc.**  
P.O. Box 16649  
Milwaukee WI 53216-0649  
www.mcnbna.org

We believe that the proposed Ruling is a continuation of national efforts to eliminate Associate Degree Nursing program, posing a significant impact on the point of entry for African American nurses into the profession.

Furthermore, we ask that you consider the fiscal estimate impact. According to a recent publication by the Robert Wood Johnson Foundation (RWJF) (2010), changes in our economy and in the workforce are requiring more efficient and effective ways of helping adults earn post-secondary credentials that develop employees that employers value. If Rulings, such as what you are proposing today, continue to evolve, the diversity of our profession will not rise above its current level and students will not see the reflection of diversity in their schools.

We ask you to look around your decision tables, and within the profession. Observe the number of "under-represent" ethnic minority nurses that were included in the passing of SB 414 and now the proposed Ruling. Once you've observed that number, compare it to the MPS district's student population. What are the ratios?

We are hopeful that the Department of Public Instruction will not be a party to an effort that will disenfranchise our under-represented, under-insured patient and student populations by passing this Rule knowing that Associate Degree nurses will be eliminated from accessing an equal opportunity for employment in our public schools systems.

Sincerely,

Vickie Hinds, RN, BSN, MBA  
President – MCNBNA







Comments of Dessie Levy, Dean of Health Occupations  
Milwaukee Area Technical College  
regarding  
Proposed Permanent Rules Amending Chapter PI 34  
Relating to School Nurse Certification  
July 30, 2010



*CRule 10-058?*

I am Dessie Levy, the Dean of Health Occupations at Milwaukee Area Technical College. I am pleased to be here today representing the Board, Administration, Students and Faculty of Milwaukee Area Technical College.

I want to thank the Department of Public Instruction for having this public hearing which gives me and others the opportunity to comment on this proposed Rule relating to school nurse certification.

As you stated in the Notice for this public hearing, the proposed rule is a result of recently enacted 2009 Wisconsin Act 160, which requires the department to prescribe the qualifications for school nurses by rule.

As all of us assembled here today know, 2009 Wisconsin Act 160 is the law which resulted from the passage of Senate Bill 414 during the 2009-10 legislative session. During the legislative debate concerning SB 414 (and its companion bill in the Assembly, AB 616), it was pointed out repeatedly by representatives of Wisconsin's Technical Colleges that the language in SB 414 which called for requiring a Bachelor's Degree to be certified as a school nurse in Wisconsin was not only not justified, but was actually very offensive to all of the highly qualified nurse graduates from our technical colleges. We were pleased when that requirement was removed from SB 414, and hopeful that our detailed comments and discussions with legislators and others during the debate of that legislation would result in a sensible and well-founded rule being written by the Department of Public Instruction dealing with this topic. Instead, we see the requirement that school nurses possess a Bachelors Degree resurfacing in this proposed rule. This is disheartening to say the least. However, it is even more troubling because it is not based on verified need or data. That is why I am here today to strongly object to the Bachelor's Degree requirement in the proposed rule.

I, along with other Deans of Nursing from the Wisconsin Technical College System, submitted a letter to the DPI on July 14, 2010. As stated in that letter, associate degree nursing programs at our colleges are required to meet strict standards to sustain our accreditation and to enable our graduates to pass the national licensure examination (NCLEX-RN). This examination confirms that graduates meet the very same criteria to care for patients "safely" regardless of A.D.N. vs. B.S.N.

There are several key concerns that I am asking DPI to consider as you make a decision on implementing a Rule that will impact nursing's future in Wisconsin:

1. MATC is a feeder-school for the Milwaukee Public School (MPS) district (the largest district in Wisconsin). Many of the students from MPS are encouraged to pursue their educational endeavors at MATC. MPS students come to MATC for the associate degree and practical nursing programs primarily because of the need to overcome their socio-economic challenges through sustainable employment (working as a Registered Nurse).
2. If this Rule is approved as drafted, the same students that are graduates of MPS and MATC's-A.D.N. program will no longer be able to return to MPS seeking employment as a "school nurse".
3. MATC is proud to have the largest diverse student population in Wisconsin. Over 30% of our nursing graduates are of color compared to the nursing population in Wisconsin hovering at a meager 10%± of the total nursing population. This ruling would certainly be a travesty to Black, Hispanic and other ethnic minority groups that rely on healthcare to "mirror" the people we are serving. Currently, our college has multiple articulation agreements with various universities (public and private) across Wisconsin and the United States. MATC is a college that universities look to for assistance with diversifying their student population. We have been genuine partners in these efforts. Many of our nursing students (school nurses) go on to pursue the B.S.N.s.

I want to make it clear that in opposing this proposed Rule we are not saying that we do not encourage and support nurses obtaining further education. We certainly believe in the value of higher education. We are simply stating that there is no documentation that supports the assertion that a Bachelors Degree in nursing is needed to professionally perform the responsibilities of school nurses. If there is a concern with the training that is needed before nurses can perform certain functions at public schools, then the Rule should address those training needs. Simply requiring a Bachelor's Degree does not address those concerns. Instead, it is difficult to not interpret such a requirement as an attempt to somehow diminish the value of the nursing degrees that are earned at the Wisconsin Technical Colleges.

MATC is gravely concerned with the proposed actions of this board that will limit the ability of A.D.N. graduates to successfully attain equity in the job market.

The appearance of this proposed Rule is that the graduates are being penalized because they attended an associate degree program as opposed to a bachelor's degree program. With that in mind, we at MATC will however continue to:

1. Oppose any restriction of employment based on type of Registered Nursing degree earned;
2. Support employment based on licensure as a Registered Nurse (regardless of degree held);
3. Support any required advanced specialized training for employment in the public schools that includes (but is not limited to) additional training in the areas of pediatrics, epidemiology and public health.

We have seen a continuing effort in Wisconsin in recent years to enact legislation that requires Bachelor's Degrees for employment in many different fields (without justification for such a credential). We are hopeful that the Department of Public Instruction will not be a party to such an attempt in this Rulemaking process. We expect better from a Department that is given the challenge of helping ALL of Wisconsin's children to learn and prosper. We ask that you not be a party to an effort by some to disenfranchise our students from their chosen profession, especially when they have shown through national testing that they are qualified and deserve an equal opportunity for employment in our school systems.

Thank you for the opportunity to appear before you this afternoon. I will be happy to answer any questions concerning my comments.

*After hearing a number of the testimonies,*

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231



**Stromme, Denise**

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**From:** Parker, Debbie [debbie.parker@wtcsystem.edu]  
**Sent:** Wednesday, September 08, 2010 3:06 PM  
**To:** Sen.Lehman  
**Cc:** vrabecn@matc.edu; sstearns@wctc.edu; mapebler@witc.edu; kay.tupala@nwtc.edu; thompson@fvtc.edu; llondre@cvtc.edu; ARe@matcmadison.edu; kgarrity@swtc.edu; frazier@ntc.edu; kvaneerden@morainepark.edu; mary.moss@mstc.edu; barb.dodge@gotoltc.edu; lmangles@nicoletcollege.edu; rwheaton-cox@blackhawk.edu; formanekp@westerntc.edu; skewesd@gtc.edu; lkrueger@cvtc.edu; levydr@matc.edu  
**Subject:** CORRECTION: Clearinghouse Rule 10-058 Final Report: Administrative Rule PI 34.01(52m), written comments relating to School Nurse certification  
**Attachments:** School Nurse Rule.pdf; School Nurse letter final.pdf; DPIschnurserpt.pdf

*I am sending this information on behalf of Morna Foy of the Wisconsin Technical College System.*

Dear Senator Lehman:

The Clearinghouse Final Report from the Department of Public Instruction regarding proposed Administrative Rule PI 34.01 relating to School Nurse certification incorrectly indicates the position expressed in written comments submitted by me on behalf of the Wisconsin Technical College System and by all sixteen technical college nursing deans and program directors. These written comments are attached. In the attached Clearinghouse report, our written comments are described as "Other" or for information only. However, as indicated in the attached submitted comments, the position of the Wisconsin Technical College System and all 16 technical college nursing deans should be described as "Opposed" in the Clearinghouse record.

I have provided this correction to all members of the Senate and Assembly Education Committees and to the Department of Public Instruction. Please contact me if you have any questions regarding this communication.

*Morna K. Foy*  
Vice President - Executive Assistant  
Wisconsin Technical College System  
4622 University Avenue  
Madison, WI 53705  
phone: 608.266.2449 fax: 608.266.1285  
[morna.foy@wtcsystem.edu](mailto:morna.foy@wtcsystem.edu)



July 29, 2010

Lori Slauson  
Administrative Rules and Federal Grants Coordinator  
Department of Public Instruction  
125 South Webster Street  
P.O. Box 7841  
Madison, WI 53707

RE: Written comments on proposed Administrative Rule PI 34.01(52m), relating to  
School Nurse certification.

Dear Ms. Slauson:

Thank you for this opportunity to provide comments, on behalf of the Wisconsin Technical College System, on proposed rule PI 34.01(52m), relating to School Nurse certification. In addition to my own comments, I have attached a letter from all 16 technical college nursing deans and program directors stating their opposition to the proposed administrative rule as it is currently written.

Based on comments and concerns raised during the last legislative session regarding AB 624, PI 34.01(52m) is intended to ensure that Wisconsin's School Nurses have adequate preparation and competency in public or community health issues without adding additional regulatory and resource demands to the Department of Public Instruction during a time of limited administrative capacity. To achieve these objectives, PI 34.01 (52m) provides local school boards and school administrators with guidance on the qualifications of a School Nurse and establishes the bachelor degree in nursing as the singular means of demonstrating and documenting those qualifications. This provision could prohibit a Registered Nurse, regardless of their public health or community health training and experience, from gaining employment as a School Nurse. For example, a Registered Nurse with an associate degree in nursing, a baccalaureate degree in social work and a master's degree in public health, would be prohibited from becoming a school nurse under the proposed rule.

As noted in the attached letter, the standard for certifying professional nurse competency is the Registered Nurse or "RN," license. RN's pass the same board examinations and licensing requirements regardless of whether they have completed an accredited associate degree in nursing (ADN) or bachelor degree in nursing (BSN). Specialized skills may appropriately be required for employment in specialized nursing settings, and, in such cases, these specialized skills are gained through specific training and the demonstration of competencies in addition to the initial nursing degree earned.

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Daniel Clancy, President

4622 University Avenue PO Box 7874 Madison, Wisconsin 53707-7874 608.266.1207

TTY: 608.267.2483 Fax: 608.266.1690

www.wtcsystem.edu www.witechcolleges.org

Lori Slauson, DPI  
July 29, 2010  
Page 2 of 2

Similarly, by deleting the word “bachelor’s” from PI 34.01 (52m), School Nurses could be required to demonstrate specific training and competencies in public and community health issues *without* limiting employment opportunities for qualified RN’s who do not hold a BSN, and *without* adding additional administrative burdens to the Department or school districts

The proposed rule would then read as follows:

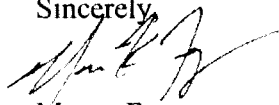
**SECTION 1.** PI 34.01 (52m) is created to read:

PI 34.01 (52m) “School nurse” means a person who is a registered nurse licensed under s. 441.06, Stats., or in a party state, as defined in s. 441.50 (2) (j), Stats., and has a ~~bachelor’s~~ degree from a nursing program that is approved by the board of nursing or accredited by the Commission on Collegiate Nursing Education and that includes preparation in public health nursing or community health nursing. An individual shall be considered a school nurse if he or she was employed by, or under contract with, a school board, a board of control of a cooperative educational service agency, a county children with disabilities education board, or an operator of a charter school established under s. 118.40 (2r), Stats., as a school nurse, on the effective date of this paragraph (REVISOR INSERT DATE).

Eliminating the reference to “bachelor’s” in the rule would require all School Nurses, regardless of their academic degree, to demonstrate that they have the desired preparation and competency in public health or community health. As a result, school districts will be better able to ensure the highest quality of nursing services to their students. On behalf of the Wisconsin Technical College System, I urge DPI to modify proposed rule PI 34.01 (52m) by deleting the word “bachelor’s” from the certification requirements.

Thank you for this opportunity to comment.

Sincerely,



Morna Foy  
Vice President/Executive Assistant  
Policy and Government Relations

Attachment





July 20, 2010

Lori Slauson  
Administrative Rules and Federal Grants Coordinator  
Department of Public Instruction  
125 South Webster Street  
P.O. Box 7841  
Madison, WI 53707

Dear Ms. Slauson:

**Statement from The WTCS Nursing Deans and WTCS Health Occupation Education Director Related to Opposition to School Nursing, (s. 441.06, Stats., or in a party state, as defined in s. 441.50 (2) (j), S) as it currently reads.**

The longstanding credential for professional nurses, the Registered Nurse or "RN," is and should remain the singular professional standard for nursing employment.

RN's pass the same board examinations and licensing requirements regardless of whether they have completed an accredited associate degree (ADN) or bachelor's degree (BSN) in nursing.

Specialized skills may appropriately be required for employment in specialized nursing settings, and, in such cases, these specialized skills are gained through specific training and the demonstration of competencies in addition to the initial nursing degree earned.

No data suggests there is any distinction in professional competency or in health and safety issues among Wisconsin nurses based on the initial nursing degree earned.

ADN graduates pass the Wisconsin RN board exams at a rate equal to and in some years exceeding the passage rate of BSN graduates on the same exams.

Wisconsin technical colleges graduated 1,357 ADN nurses in 2009, and provided affordable statewide access for nursing students including significant numbers of minority students and place-bound rural students. Associate Degree Nursing programs in Wisconsin are also approved and accredited.

The way the rule currently reads, an ADN educated RN with a Master's in Public Health would not be able to work as a school nurse.

Therefore, we would request that DPI remove the word "bachelor's" from the proposed rule. The proposed DPI rule in part states: "School nurse" means a person who is a registered nurse licensed under s. 441.06, Stats., or in a party state, as defined in s. 441.50 (2) (j), Stats., and has a bachelor's degree from a nursing program that is approved by the board of nursing or accredited by the Commission on Collegiate Nursing Education and that includes preparation in public health nursing or community health nursing. By simply removing the word "bachelor's," all Wisconsin school nurses will be licensed RN's, from accredited programs, prepared in public health or community health nursing.

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Daniel Clancy, President

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We are not opposed to additional training for all school nurses in the areas of Pediatrics, Epidemiology and Public Health to be a School Nurse.

Sincerely,

*Kathy D. Loppnow RN, MSN*

Kathy Loppnow, RN, MSN  
Health Occupations Education Director  
Wisconsin Technical College System  
608-266-7608 fax 608-266-1690  
[kathy.loppnow@wtcsystem.edu](mailto:kathy.loppnow@wtcsystem.edu)

*Antonio Re*

Antonio Re, CDT, RDH, MA  
Associate Dean, Center for Health & Safety Education  
Madison Area Technical College

*Dessie Levy*

Dessie Levy, PhD(c), RN, MSHA  
Dean, Health Occupations Division  
Milwaukee Area Technical College

*Nancy J. Vrabec*

Nancy Vrabec, PhD, RN  
Associate Dean, Nursing  
Milwaukee Area Technical College

*Sandra Stearns MSN, RN*

Sandra Stearns, MSN, RN  
Interim Dean Nursing & Allied Health  
Waukesha County Technical College

*Mary Ann E. Pebler, MSN, RN*

Mary Ann E. Pebler, MSN, RN  
Divisional Dean, Allied Health  
Wisconsin Indianhead Technical College

*Kay L. Lupala*

Kay Lupala, RN, MSN  
Dean, Health Sciences  
Northeast Wisconsin Technical College

*Carrie A. Thompson, MSN, RN*

Carrie Thompson, MSN, RN  
Department Chair of Nursing  
Fox Valley Technical College

*Linda Londre*

Linda Londre  
Program Director, Nursing  
Chippewa Valley Technical College

*Diane Skewes*

Diane Skewes, MSN, RN  
Associate Dean of Nursing  
Gateway Technical College

*Linda Krueger*

Linda Krueger RN MSN EdS  
Associate Dean of Health  
Chippewa Valley Technical College

*Katie Garrity*

Katie Garrity, MSN, GCNS, BC  
Dean of Health & Service Occupations  
Southwest Wisconsin Technical College

*Sharon Frazier*

Sharon Frazier RN, MSN  
Dean, Health Occupations  
Northcentral Technical College

*Kathy Van Eerden*

Kathy Van Eerden, MS, RN, CNE  
Dean of Health Sciences  
Moraine Park Technical College

*Mary E. Moss*

Mary E. Moss RN MSN EdD  
Associate Dean - Nursing  
Mid-State Technical College

*Barbara J. Dodge*

Barbara J. Dodge, Ph.D., R.N.  
Dean, Health and Human Services  
Lakeshore Technical College

*Lenore Mangles*

Lenore Mangles, MSN, RN  
Dean, Health Occupations  
Nicolet Area Technical College

*Ruth L. Wheaton Cox*

Ruth Wheaton Cox, RN, MS  
Nursing Coordinator  
Blackhawk Technical College

*Patricia Formanek*

Patricia Formanek MSN RN  
Associate Dean Health and Public Safety  
Western Technical College

FINAL REPORT  
CLEARINGHOUSE RULE 10-058  
SECTION PI 34.01 (52m)  
SCHOOL NURSE CERTIFICATION

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Analysis by the Department of Public Instruction

Statute interpreted: s. 115.001 (11), Stats.

Statutory authority: ss. 115.001 (11) and 227.11 (2) (a), Stats.

Explanation of agency authority:

Section 115.001 (11), Stats., requires the department to prescribe the qualifications for school nurses by rule.

Section 227.11 (2) (a), Stats., gives an agency rule-making authority to interpret the provisions of any statute enforced or administered by it, if the agency considers it necessary to effectuate the purpose of the statute.

Related statute or rule: N/A

Plain language analysis:

2009 Wisconsin Act 160 requires the department to prescribe the qualifications for school nurses by rule. To meet the requirements under the Act, the department is modifying Chapter PI 34, relating to Teacher Education Program Approval and Licenses, by creating a definition of "school nurse" under s. PI 34.01 (52m) and by modifying the school nurse licensing information under s. PI 34.31 (2).

The DPI school nurse license which requires completion of a school nurse practicum and an institutional endorsement, is still an optional license and is not required for a nurse to work in a school. In the past, a school nurse only had to hold a license as a registered nurse under the Department of Regulation and Licensing. The rule will require a school nurse to hold a bachelor's or master's degree in nursing as well.

An individual employed by, or under contract with, a school board, a CESA, a CCDEB, or charter school as a school nurse on January 1, 2011, shall be considered a school nurse, regardless of whether or not that individual holds a bachelor's degree.

To coincide with the Act's effective date, the rule will become effective January 1, 2011.

Summary of, and comparison with, existing or proposed federal regulations: N/A

Comparison with rules in adjacent states:

Iowa does not have rules relating to the qualification of school nurses.

Illinois and Minnesota require a school nurse to be a registered professional nurse with a bachelor's degree.

Michigan requires that a professional school nurse be a registered professional nurse with a bachelor's degree. Michigan also offers a standard school nurse certificate requiring the applicant to be a registered nurse.

Summary of factual data and analytical methodologies:

2009 Wisconsin Act 160 clarifies that a nurse may be employed by a school district without being "certified" by the department but rather "meets the qualifications prescribed by the department." The DPI school nurse license under s. PI 34.31 (2) requires the applicant to have, in part, a school nursing practicum and an institutional endorsement. This DPI license is optional and is not required for a nurse to work in a school. The Act removes the department's certification requirement and replaces it with the qualifications for school nurses prescribed by the department in rule. The qualifications specified in this rule will better reflect current practice without reducing the qualifications of the state's school nurses.

Analysis and supporting documents used to determine effect on small business or in preparation of economic impact report: N/A

Anticipated costs incurred by private sector: N/A

Effect on small business:

The proposed rules will have no significant economic impact on small businesses, as defined in s. 227.114 (1) (a), Stats.

Agency contact person: (including email and telephone)

Douglas White, Director, Student Services/Prevention and Wellness, (608) 266-5198, [douglas.white@dpi.state.wi.us](mailto:douglas.white@dpi.state.wi.us).

Place where comments are to be submitted and deadline for submission:

The department published a hearing notice in the *Administrative Register* which included this information.

A public hearing to consider the proposed rule was conducted by the department on July 30, 2010, in Madison. Persons were asked to register in favor, generally in favor (except for . . .), against, generally against (except for . . .), or for information only.

*Madison Hearing, July 30, 2010*

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Freddi Adelson	Self	X		
Holly Bauer	Wis Assoc. of School Nurses	X		
Robert Benson	Self		X	
Kathleen A. Brockman	Wis Assoc of School Nurses	X		
Kathleen Cullen	Wis Technical College System		X	
Gina Dennik-Champion	Wis Nurses Assoc	X		
Tim Elverman	Milwaukee Area Technical College		X	
Eric Gage	Wis Student (tech college) Government		X	
Linda Krueger	Chippewa Valley Technical College		X	
Dessie Levy	Milwaukee Area Technical College		X	
Kathy Loppnow	Wis Technical College System		X	
Terri Mauel	Self/Wis Assoc of School Nurses	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Donna McGinley	Self	X		
Ann Riojas	Wis Assoc of School Nurses	X		
Mary Beth Schall	Self	X		
Rita M. Simon	Wis Assoc of School Nurses	X		
Jacob Weigandt	Madison College Students		X	
Louise Friday Wilson	Wis Assoc of School Nurses	X		

*The following persons submitted written testimony:*

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Paul Akert	Self	X		
Lori Anderson	UW Wisconsin Madison School of Nursing	X		
Judith Aubey	Self	X		
Trisha August	Self	X		
Melanie Baehr	Self			X
Mary Jo Baisch	Self	X		
Chistine Baker	Self	X		
Claudia C. Bartz	Self			X
Mary Jo Beining	Self	X		
Polly Benish	Self	X		
Rosemary E. Berger Barb Bendall Diana Hoffman Lisa Jensen Toni Zastrow Lynn Zaspel Sarah Borchert Mary Hunt	Fort Health Care			X
Nicole Berndt	Self			X
Tara Beuscher	Self	X		
Martha Dewey Bergren	National Assoc. of School Nurses	X		
Susan Bietila	Self	X		
Amy Bigjohn	Self	X		
Marla Blom	Self	X		
James A. Bockeloh	Self	X		
Diane Bosovich	Self	X		
Beth Brower	Self	X		
Michael Burke	Milwaukee Area Technical College			X
Bonnie Campbell	Self	X		
Margaret Carew	Self	X		
Bridget Carnahan	Self	X		

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Bette Carr	Self	X		
Maria Arenas Cary	Self			X
Linda Christian	Self			X
Elly McGraw Chybowski	Self			X
John Clark, PhD	Mid-State Technical College		X	
Lee Clay	Self		X	
Lauren Coleman	Self			X
Ann E. Conway	Self	X		
Ann Cook	Self	X		
Nancy H. Crowley	Self		X	
Theresa G. Daane	Self			X
Kathy Dahl	Self	X		
Michele De'Brabant	Self	X		
Hanneke Deeken	Self	X		
Kathleen Demien	Self			X
Mary Lou Devlin	Self			X
Paulette DiVall	Self			X
Jennifer Doering, PhD	Self	X		
Rosemary P. Dolatowski	Self	X		
Teresa Du Chateau	Self	X		
Rebecca Ecker	Self	X		
Mary E. Fazio	Self			X
Marina Flores-Cavins	Self	X		
Seth Foldy Margaret Schmelzer	Wis Department of Health Services	X		
Morna Foy	Wis Technical College System			X
Erry Fulwiler	Self		X	
Ellen Garner	Self	X		
Laurie K. Glass	Self	X		
Marcee Gohr	Self	X		
Susan Esser-Greenberg	Self	X		
Diane Graebner	Self			X
Kathy Graham	Self	X		
Pamela L. Guthman	Self	X		
Diane J. Hamilton	Self	X		
Paula Haus	Self	X		
Bonnie Heindel	Self	X		
Tonya Hess Lucas Kuhlow Dean Floreani Catherine Peek	Gateway Technical College *			X
Eugenie Hildebrandt	Self	X		
Vickie Hinds	Milwaukee Chapter National Black Nurses Assoc, Inc.			X

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Brenda Holman	Self	X		
Valerie Hon	Portage Community School District	X		
Sharon Hulce	Self			X
Jane Imholte	Self	X		
Gary Jechorek	Self	X		
Cynthia Johnson	Self	X		
Michelle Kaczorowski	Self	X		
Lori Kawleski	Self	X		
Lisa Kein	Self	X		
Mary Kelroy-Skelton	Self			X
Charlene Kizior	Self	X		
Sandy Koch	Self	X		
Betty Koepsel	Self	X		
Jean M. Koltunski	Self	X		
Valerie Krueger	Self		X	
Heather Krumnow	Self	X		
Brenda Krupa	Self	X		
Mike Lanser	Lakeshore Technical College			X
Mary Beth Larscheidt	Self			X
Twyla Lato	Self	X		
Mark Lausch	Madison Area Technical College		X	
Kristi Lawrence	Self	X		
Diane Lindh	Self	X		
Mary Klarer Logemann	Self	X		
Sally Lundeen	Self	X		
Mary Lyke	Self	X		
Patrice Lynam	Self	X		
Barbara Brancel Maley	Self	X		
Kathy Marcy	Self	X		
Christopher J. Matheny	Self			X
Susan A. May	Self			X
Emily McGinley	Self	X		
Wendy McGuire	Self	X		
Julia M. McKnight	Self	X		
Tia C. Medley	Self			X
Debra Meinke	Self	X		
Eileen Mirsberger	Self	X		
Karen J. Morris	Self	X		
M. Kathleen Murphy	Self	X		
Carol Naze	Self	X		
Carla Nierengarten	Self			X
Becky O'Neill	Self	X		
Kerrie Paupore	Self	X		
Kathleen S. Pearce	Self			X

NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Barbara Peterson	Self			X
Toni Pinkowski	Self	X		
Sue Pohlkamp	Self			X
Julie Pompos	Self			X
Ed Possing	Self			X
Marlene Prieue	Self	X		
Paul C. Proulx and Lori A. Weyers	Northcentral Technical College		X	
H. Jeffrey Rafn	Northeast Wisconsin Technical College		X	
Ike Rebout	Student Government Western Tech College			X
Richard C. Recktenwald, Jr	Self			X
Susan Resch	Self			X
Mary B. Reynolds	Self	X		
Kelly Richards	Self			X
Rebecca Richards	Self	X		
Cindy Roach	Self			X
Patricia A. Robinson, PhD	Fox Valley Technical College		X	
Sally Roepe	Self	X		
Marijo Rommelfaenger	Self	X		
Judy Sargent	Self			X
Rachel F. Schiffman	Self	X		
Patricia Schmeling	Self	X		
Doris Schoneman	Self	X		
Jo Schoohs	Self	X		
Anita E-B Schubring	Self			X
Rosanne M. Schulz	Self	X		
Lindsay Shoemaker	Self	X		
Bonnie Siegel	Self	X		
Michelle Simpson	Self	X		
Diane Skewes	Gateway Technical College		X	
Lori Soderberg	Self	X		
Julie Sonnenberg	Self	X		
Michelle Stearns	Self			X
Susan P. Stroupe	Self	X		
Lillie M. Sullivan	Self	X		
Kristen R. Swanson	Self	X		
Rebecca Swenson	Self			X
Theresa A. TeSelle	Self	X		
Mary Thompson	Self			X
Erin M. Thornley	Madison Area Technical College		X	
Becky L. Tollers	Self			X
Ruth Tripp	Self			X



NAME	ORGANIZATION	IN FAVOR OR GENERALLY IN FAVOR	OPPOSED OR GENERALLY OPPOSED	OTHER
Mary Jo Turner	Self	X		
Lisa Tuszka	Self	X		
Kenneth E. Urban	Nicolet Area Technical College			X
Karen Van Handel	Self	X		
Cindy Vandenberg	Self	X		
Pang C. Vang	Self			X
Tammy Voss	Self	X		
Nancy Vrabec, Phd Sandra Stearns Mary Ann E. Pebler Kay Tupala Carrie Thompson Linda Londre Antonio Re Katie Garrity Sharon Frazier Kathy Van Eerden Mary E. Moss Barbara J. Dodge, PhD Lenore Mangles Ruth Wheaton Cox Patricia Formanek	Wisconsin Technical College System			X
Judith A. Walker, PhD	Self			X
Karen E. Wertanen	Self	X		
Deborah J. Werth	Appleton Area School District	X		
Joan Wilk	Self	X		
Denise Wirth	Self			X
Karen Witt	Self	X		
Susan Wollmer	Self	X		
Barbara J. Wolf	Self			X
Shirley J. Yaeger	Self			X
Wendy L. Zimmerman	Self	X		

*Summary of public comments relative to the rule, the agency's response to those comments, and changes made as a result of those comments:* The department received a large amount of written testimony that did not clearly state a position on the rule.

#### Background –

There are three typical educational paths to registered nursing – a bachelor's of science degree in nursing (BSN), an associate degree in nursing (ADN), and a diploma. BSN programs, offered by colleges and universities, take about 4 years to complete. ADN programs, offered by technical colleges, take about 2 years to complete. Diploma programs, administered in hospitals, last 3 years but are no longer available. Individuals who complete a bachelor's degree receive more training in areas such as communication, leadership, and critical thinking, all of which are becoming

more important as nursing practice becomes more complex. Additionally, bachelor's degree programs offer more clinical experience in nonhospital settings.

#### Comments in support –

Several school districts (Madison, Milwaukee, Green Bay, Racine, etc.) already require school nurses to have the BSN as the minimum educational preparation.

Requiring the BSN is consistent with the recommendations of the National Association for School Nurses (NASN), Wisconsin Nurses Association, and the American Academy of Pediatrics and is supported by the Wisconsin Department of Health Services.

There are 25 states that currently require nurses to hold a bachelor's degree for becoming certified as a school nurse.

Additional comments in support are listed below.

#### Comments in opposition –

**Comment** – There is a national effort to undermine the ADN degree. This will have a chilling effect on ADN programs and will adversely affect employment opportunities, in particular, for nurses of color in Wisconsin.

**Discussion** – It is not the department's intent to undermine ADN programs or employment opportunities for nurses of color.

School nursing is a specialized area of nursing practice that occurs in a non-health-care, community-based setting. It is a highly independent role without a medical provider on site. Registered nurses with a bachelor's degree are prepared for positions in both inpatient and community settings and for moving into leadership responsibilities. Baccalaureate prepared nurses possess knowledge of health promotion, disease prevention, and risk reduction as well as illness and disease management and are prepared to assist individuals, groups, and communities to prevent disease and achieve optimum levels of wellness. School nurses are the health care expert within the school, assessing the overall system of care and developing a plan for assuring that health needs are met and taking a leadership role in the development and evaluation of school health policies.

Wisconsin public health nurses are mandated to have a bachelor's degree in nursing. School nurses provide public health nursing in schools and consequently should have the same education requirements as their counterparts in the community health. A BSN nurse receives additional education and training in public health curriculum including: public health curriculum in epidemiology, emergency preparedness, disease prevention and promotion, communicable disease and immunization management. These competencies are not found in the curriculum of a 2-year degree or ADN program.

**Changes** – None.

**Comment** – Wisconsin's technical colleges graduated 1,357 ADN nurses in 2009. ADN graduates pass the same board examinations and licensing requirements as bachelor's degree graduates at equal or better percentage rates. There is no data that suggests there is any significant distinction in professional competency or in health and safety issues among Wisconsin nurses based on the underlying degree earned.

**Discussion** – As the health care of students becomes more complex and high-tech, there is a growing body of evidence that a more highly-educated nursing workforce results in improved patient safety and higher-quality, more cost-effective health care. Increasing numbers of students live in poverty or in homes where a language other than English is spoken. They often lack access to health care. For some children, contact with a school nurse is the only consistent access to a health care professional that they have. Students bring complex health needs to school (asthma, attention problems, serious food or insect sting allergies, diabetes). School nurses have increasingly been asked to provide services to students with chronic conditions and students recovering from surgery, acute illnesses, and injuries.

As stated above, school nurses provide public health nursing in schools and consequently should have the same education requirements as their counterparts in the community health. A BSN nurse receives additional education and training in public health curriculum including: public health curriculum in epidemiology, emergency preparedness, disease prevention and promotion, communicable disease and immunization management. These competencies are not found in the curriculum of a 2-year degree or ADN program.

**Changes** – None.

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**Comment** – Instead of requiring a bachelor's degree, the rule should require that a school nurse be a licensed RN in good standing without regard to the degree earned but with specific and appropriate training, professional competencies and professional experiences deemed necessary to be a school nurse.

**Discussion** – That is the intent of the rule. A bachelor's degree will ensure the school nurse has specific and appropriate training, professional competencies and professional experiences. If specific training, competencies and experiences were listed individually in the rule, a school board would have to review the transcripts of each person applying for a school nurse position to determine his or her eligibility. This would add an unnecessary burden to a school board.

**Changes** – None.

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**Comment** – It is unclear what, if any, credentials an individual must have to be grandfathered as a school nurse. For instance, can an LPN be grandfathered as a school nurse or does there have to be a minimum requirement?

**Discussion** – The school nurse under this provision would have to be a registered nurse licensed under ch. 441, Stats., or in a party state, as defined in s. 441.50 (2) (j) per the former statutory definition of school nurse under s. 115.001 (11), Stats.

**Changes** – None.

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**Comment** – What if there aren't enough nurses with BSNs to fill the need?

**Discussion** – In 2009, the department surveyed school nurses regarding their educational preparation. With an estimated 80 percent of school nurses responding, 93 percent have a bachelor's, master's or doctorate degree; and only 5 percent had an associate degree in nursing. Thus, it appears a shortage should not be an issue.

**Changes** – None.

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**Comment** – There is concern that the school nurse bachelor’s degree requirement would make hiring nurses in smaller school districts even more difficult.

**Discussion** – A 2009 DPI survey shows that only 5 percent of school nurses in Wisconsin have an associate degree in nursing. These nurses, if still working in the school January 1, 2011, will be allowed to continue working as a school nurse. Most school districts already require school nurses to have a BSN. Further, many small school districts contract with a county health board or CESA to provide nursing services for their schools.

**Changes** – None.

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**Comment** – Representatives of one technical college testified that they were pleased when the school nurse bachelor’s degree requirement was removed from 2009 Senate Bill 414 and are disheartened to see this language in the department’s rule.

**Discussion** – In Senator John Lehman’s January 27, 2010 testimony to the Senate Committee on Education regarding Senate Bill 414, he said

We, along with DPI, have worked with the technical colleges to craft language that would amend the bill to put the qualifications of school nurses into the rule process rather than in statute. The technical colleges have agreed to proposed rule language that would require a school nurse to have a bachelor’s degree from a nursing program that is approved by the board of nursing or accredited by the Commission on Collegiate Nursing Education and that includes preparation in public health nursing or community health nursing.

The reasoning behind this requirement is that school nurses are asked to do far more than standard clinical work in a setting where they are likely the only medical professional present. Workplace demands call for proper public health training, which is obtained through a baccalaureate program.

**Changes** – None.

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**Comment** – It was suggested that additional school district recruiting requirements and procedures for school nurses be specified in the rule.

**Discussion** – The rule defines school nurse and specifies school nurse certification requirements. It would not be appropriate to specify recruiting requirements in this rule.

*Changes to the analysis and rule made as a result of oral or written testimony:*

A nurse can receive a master’s degree in nursing without receiving a bachelor’s degree in nursing using a “direct route” education experience. Thus, the department is modifying s. PI 34.01 (52m) to clarify that a school nurse means a person who is a registered nurse licensed under s. 441.06, Stats., or in a party state, as defined in s. 441.50 (2) (j), Stats., and has a bachelor’s or master’s degree from a nursing program . . .

Also, the grandfathering provision under s. PI 34.01 (52m) has been modified to clarify that a school nurse employed on (instead of on or before) January 1, 2011 may continue serving as a school nurse.

*Changes to the fiscal estimate:* None.

*Responses to Clearinghouse Report:*

2. Form, Style and Placement in Administrative Code:

a. The reference to (REVISOR INSERT DATE) has been deleted and replaced with “on January 1, 2011” as that is the date the rule will become effective.

b. Recommendation accepted, changes made.

c. Recommendation accepted, changes made.

FINAL REGULATORY FLEXIBILITY ANALYSES

Summary of Final Regulatory Flexibility Analysis:

The proposed rules will have no significant economic impact on small businesses, as defined in s. 227.114(1)(a), Stats.

Summary of Comments:

No comments were reported.



## Dauscher, Sara

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**From:** Kammerud, Jennifer DPI [Jennifer.Kammerud@dpi.wi.gov]  
**Sent:** Thursday, September 09, 2010 10:55 AM  
**To:** Kammerud, Jennifer DPI  
**Cc:** Slauson, Lori L. DPI; Thompson, Michael DPI  
**Subject:** RE: CORRECTION: Clearinghouse Rule 10-058 Final Report: Administrative Rule PI 34.01(52m), written comments relating to School Nurse certification

**Importance:** High

**Attachments:** FW: CORRECTION: Clearinghouse Rule 10-058 Final Report: Administrative Rule PI 34.01(52m), written comments relating to School Nurse certification

**To:** Members of the Assembly and Senate Education Committees  
**From:** Jennifer Kammerud, Legislative Liaison, DPI  
**Date:** September 9, 2010  
**Re:** CORRECTION: Clearinghouse Rule 10-058 Final Report: Administrative Rule PI 34.01(52m), written comments relating to School Nurse certification

This e-mail is in response to the communication the Department of Public Instruction (DPI) recently received via e-mail from Morna Foy of the Technical College System clarifying their position on the proposed rules related to the requirements to be a school nurse. It is the department's understanding that each of you also received this e-mail (see attached).

The department only recorded testimony in the support or oppose columns when it was clear the position an individual or organization writing was taking. It should be noted that many more individuals writing in support of the bachelor's requirement, but not taking a clear position on the rule, were put in the information only category than those opposed. In addition, it was not clear from the multiple communications the department received both from Ms. Foy and others in the technical college system how the position being taken should be recorded. The department can only record one position for each individual and organization. While we received the communication Ms. Foy shared with you in the attached e-mail, it created ambiguity as to how to record their position. In her July 29 letter (see attached e-mail) she notes that the 16 technical college nursing deans and program directors oppose the proposed rule and provides an attachment with their signatures. However, some of those individuals wrote in separately and the attachment was not submitted directly to the rules coordinator to enter as testimony as required in the department's hearing notice. Furthermore, at the end of the July 29 letter Ms. Foy states the position of the Technical College System is to modify the proposed rule.

We will continue to make it clear that individuals commenting at rule hearings or in submitted written testimony are required to indicate whether they are speaking or writing in support, opposition, or for information only. If you have any questions or would like to talk to me further about this I can be reached at the contact information listed below.



FW: CORRECTION:  
Clearinghouse ...

Jennifer Kammerud  
Legislative Liaison  
Wisconsin Department of Public Instruction  
125 South Webster Street





**Stromme, Denise**

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**From:** Rose Dolatowski [rdolatowski@basd.k12.wi.us]  
**Sent:** Wednesday, September 15, 2010 1:13 PM  
**To:** Sen.Lehman  
**Subject:** Administrative rule 10-058 BS requirement for School Nurse

Dear Senator Lehman,

I am in favor of the requirement of RN's having a minimum of a BS degree to be defined as a School Nurse. This is necessary to ensure the health & safety of the students attending schools in Wisconsin. Baccalaureate prepared RN's have more in-depth knowledge regarding Community health, Public Health, Mental Health and Communicable diseases. These are all very important aspects of school health today. We are the school liaison with the student's medical home, or helping these individuals access medical care.

A BS degree is a requirement of all Public Health nurses. Schools are the "community" in which we serve as Public Health nurses. We work very closely with our Public Health Departments, carrying out the mission of school / public health safety. Children are arriving on our school doorsteps with much more complex health issues. It is imperative that school nurses be educated at a minimum of a BS degree, as many of these students are requiring nursing procedures that require nursing direction and supervision. The National Association of School Nurses and American Academy of Pediatrics both insist on the school nurse having a BS degree. It is the school nurse's role to reduce barriers to education. We do this by ensuring their safety in school through education and training of those who will be teaching and working with students.

I thank you for your support and hope strongly that you see the importance of this requirement. If you would like to discuss this with me further please do not hesitate to contact me.

Sincerely,  
Rosemary P. Dolatowski RN, MS

Rosemary P. Dolatowski RN,MS  
Director, School Health Services  
Burlington Area School District  
100 N.Kane St.  
Burlington, WI 53105  
262-763-0210  
rdolatowski@basd.k12.wi.us



**Stromme, Denise**

**From:** August, Trisha [augustt@ricelake.k12.wi.us]  
**Sent:** Wednesday, September 15, 2010 10:04 AM  
**To:** Sen. Lehman  
**Subject:** Administrative Rule 10-058

On September 21, the Senate Committee on Education will hold a public hearing on the Department of Public Instruction (DPI) administrative rule (Clearinghouse Rule 10-058) containing the requirement for school nurses in the State of Wisconsin to hold a Bachelor's Degree in Nursing. I am writing to you in support of this rule for a variety of reasons, most importantly the safety of students within our great state.

As a registered nurse in the state of Wisconsin for the past 15 years my practice has focused on children and families in a capacity as a Private Duty Nurse, Home Health Care Nurse, Childcare Health Consultant, Public Health Nurse, School Health Consultant and now as School Nurse for the Rice Lake Area School District. During those 15 years I have cared for children with very severe medical needs including children with congenital heart conditions, breathing problems with home ventilator support, tube feedings, severe seizure disorders, cancer, neurological disorders, etc. I have also cared for the common student who may have a severe allergy to peanuts or a mild case of asthma, may be dealing with consequences of diabetes or a mental health condition.

I have watched as the health needs of children in general has increased over time and I have watched as community resources to provide for those health needs has diminished. Advances in medical care have also contributed to more students attending school with health conditions that may, only a few years ago, rendered them unable to leave their homes. Families whose children once qualified for Private Duty Nursing Services have been forced to quit their jobs to stay home to care for their children as Private Duty Nursing Services have diminished throughout the state. Medically fragile children who, even 15 years ago may not have attended school at all, are attending school with their peers. Statistics show that certain health conditions such as asthma, severe allergies and diabetes have dramatically increased in children over the past several years. Unfortunately the budgets for health services in schools has not changed to accommodate the influx of health needs and many school children are attending school every day with no access to health services.

Within the state of Wisconsin it is fact that one may attend a 2-year Associate Degree Program or choose to complete a 4-year Baccalaureate Program in order to become a Registered Nurse. No matter which degree is attained, graduates from either program take the same State Licensing Exam and, if found competent, are awarded a license as a registered nurse. This has long been a point of contention within the field of nursing because of the differences in the content of instruction for each degree. The one main difference of employability between the 2 nursing degrees at this point in time is that Public Health/Community Health is not a focus of an Associate Degree program and Public Health Nurses within the state of Wisconsin are bachelor's-prepared nurses.

The role of school nurse is multi-faceted. School nurses provided one-to-one direct health services to students, but many times this is a minimal role due to time, budget and availability constraints within the school system. School nurses are forced to delegate medical tasks such as diabetic care, medication administration, tube feedings, seizure management, etc. to unlicensed school personnel with little or no medical training or background. We train, monitor, supervise, write health plans, attend Individualized Education Plan meetings, write policies and procedures and have the sole responsibility of the health of the students and staff within our buildings.

While I am currently employed as a full-time nurse within my school district, I am spread between a high school with over 750 students, a middle school with over 500 students and an elementary school with over 200 students.

Amazingly, this is a much better system than in my last district where I was given on average, 8 hours per week, to cover a middle school of 1400 students, 3 elementary schools with total enrollment of approximately 1200 students and a small pre-school/head start program in addition to other roles and responsibilities as a public health nurse for the Eau Claire City-County Health Department. The National Association for School Nurses recommends a nurse to student ratio of 1 full-time nurse for every 750 students, a goal that has been adopted by the Centers for Disease Control. There are very few, if any schools in the State of Wisconsin that meet this recommended ratio.

So why all the background information in relation to nursing in general? My experience in the field of nursing has shown me that the experiences I have had in public health/community health nursing has been essential to my practice as a school nurse. My bachelor's degree provided me with a well-rounded nursing education that provided me with critical-thinking skills, the ability to analyze statistical data in relation to student and community populations, a broad knowledge base to access health information from a wide variety of resources, and the ability to function independently as a nurse administrator. Can a 2-year Associate-prepared nurse do all that? Over time, and with years of experience, yes. The public health/community health piece however is not something that will, in my opinion, be encountered by someone with an Associate Degree in Nursing.

As budgets for schools, health care, insurance, etc continue to decrease we need to all work together to provide our children with good quality care. Schools are an excellent place for students to have access to that care and will need to maintain a standard of quality within the health professionals caring for them to make this happen. Please vote to place a bachelor's degree-prepared nurse as a minimum requirement for the role of school nurse in Wisconsin. Every child deserves a high quality school nurse!

*Trisha August, R.N*  
School Nurse  
[augustt@ricelake.k12.wi.us](mailto:augustt@ricelake.k12.wi.us)  
Rice Lake High School  
715-234-2181 ext 5110  
Rice Lake Middle School  
715-234-8156 ext 5110  
Hilltop Elementary School  
715-234-4998 ext 5110



**Stromme, Denise**

**From:** Mathew, PK [MathewP@westerntc.edu] on behalf of Rasch, Lee [RaschL@westerntc.edu]  
**Sent:** Wednesday, September 15, 2010 11:38 AM  
**To:** Sen. Lehman  
**Cc:** Rasch, Lee; Boudreau, Margaret; Neefe, Diane; Formanek, Patricia  
**Subject:** School Nurse ADN-BSN

C-Rule 10-058?

# Western Technical College

A WISCONSIN TECHNICAL COLLEGE

The Honorable John Lehman  
 Senate Education Committee

Western Technical College is writing to you to express our concern over the Department of Public Instruction's proposal to require a bachelor of science in nursing (BSN) for all school nurses. The Senate Education Committee will be holding a hearing on the proposed change on Tuesday, September 21, 2010 at 9am. Western Technical College has high standards in its associate degree nursing (ADN) program and our students score well on the national board exam (NCLEX). Given the anticipated nursing shortage in the upcoming years, it is important to support associate-degree nursing programs. Recognize the fact that both four-year and two-year nursing students take the same licensure exam and upon successful completion both are considered registered nurses (RNs).

Second, Wisconsin's population is becoming more diverse. The literature points to the fact that two-year colleges are the gateway to education for low-income and minority students. Employers wishing to have a workforce reflective of their community's population are looking to two-year colleges to meet their diversity goals.

As an added point, public health nurses that are employed by the state and counties are currently required to have a BSN. While this may not be an issue in large urban areas, in rural Wisconsin many counties face challenges in finding bachelor-prepared RNs for their open positions. There is currently a task force in Wisconsin attempting to address the lack of public health nurses as a result of the bachelor requirement; the task force is proposing to address the issue by hiring associate degree RNs with a stipulation of obtaining additional course work to complete their bachelor degree within a predetermined number of years.

Please note that we do not object to the position that the Department of Public Instruction may establish rules for school nurses. Indeed, we have a long-standing positive relationship with DPI and local school districts. *If the proposed rules established would require a school nurse to be a registered nurse (RN) with the required coursework in public health (or similar areas), this would maintain an open door for associate degree graduates who wished to take additional coursework (such as in public health) in order to qualify for the position of school nurse, without specifically requiring the bachelors degree. We would be very supportive of this common sense approach.*

It is our hope that you take these issues into consideration. Furthermore, we are asking that you support our position by contacting members of the Senate Education Committee, urging support for the position which requires an RN with proper coursework as determined by DPI. Meanwhile, please contact me if you have any questions.


Yours respectfully,

*Lee* Rasch, EdD \_\_\_\_\_

President, Western Technical College

9/15/2010

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THE  SSENTIAL EXPERIENCE





## Stromme, Denise

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**From:** Freddi Adelson [fadelson@madison.k12.wi.us]  
**Sent:** Thursday, September 16, 2010 4:26 PM  
**To:** Sen. Lehman  
**Subject:** Clearinghouse Rule 10-058 relating to school nurse certification

Dear Senator Lehman,

I am unable to attend the Senate, Committee on Education Public Hearing on Tuesday, September 21, 2010 so I am providing written comments. I am a bachelor's and master's prepared pediatric nurse practitioner. This is my 26th year with the Madison Metropolitan School District (MMSD). I was a school nurse for about 15 years in the MMSD and currently, in my role as the Health Services Administrator for the district, I recruit, hire, supervise and evaluate school nurses so I know first hand what knowledge and skills nurses need to bring to the job.

I write in strong support of the proposed permanent rule change to PI 34 relating to school nurse qualifications. The proposed rule change requires that the school nurse hired after January 1, 2011 must have a minimum of a bachelor's degree in nursing (BSN). It allows those nurses with lesser educational preparation hired before the effective date to continue as school nurses.

Requiring the BSN for school nurses is the right thing to do. It is consistent with the recommendations of the National Association for School Nurses (NASN). School nursing is a specialty area of practice. School nurses function very independently on a day to day basis with little or no support from other school staff or other nurses. They are in leadership positions in each of their schools and make decisions and provide care that is at the intersection of education and health care. Their work is always guided by the goal of removing or limiting health barriers to school attendance and success.

The curriculum of the BSN program provides the knowledge and skills that will allow nurses to practice safely and effectively in the school setting. Baccalaureate nursing education provides course work in community/public health nursing and leadership strategies—both critical to the practice of school nursing.

School nurses are part of school teams that go by different names but which all look at students who are not succeeding. These teams examine the possible causes for lack of achievement, come up with solutions, put plans in place to address the problems and evaluate whether the plans work. School nurses need to have an educational preparation that is consistent with that of other team members such as school psychologists, school counselors and school social workers.

Increasing numbers of students live in poverty or in homes where a language other than English is spoken. They often lack access to health care. Students bring complex health needs to school. In my school district, about 10-12% of students have asthma, another 5-7% have attention problems, almost 3% have serious food or insect sting allergies, and about 60 students have diabetes. Baccalaureate preparation is the minimum necessary for school nurses to have the required skills to handle the planning and training so that these students are safe and ready to learn.

The MMSD has always required the BSN as the minimum educational preparation for school nurses (as well as requiring the DPI School Nurse Certification by the end of the third year of employment). Most school nurses in the MMSD are master's prepared nurses specializing in pediatrics and many are Advanced Practice Nurse Prescribers. School nurses can and do make the difference for students. School nurses need to have a minimum of a baccalaureate in nursing to be prepared for the challenges and opportunities of the school nurse role. I urge you to move forward with the creation of the administrative rule updating PI 34.

Sincerely,  
Freddi Adelson



**Stromme, Denise**

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**From:** Lato, Twyla [tlato@waukesha.k12.wi.us]  
**Sent:** Friday, September 17, 2010 9:54 AM  
**To:** Sen. Lehman  
**Subject:** Clearinghouse Rule 10-058

Dear Senator Lehman:

I am writing to request your support for the Department of Public Instruction (DPI) administrative rule containing the requirement (Clearinghouse Rule 10-058), because you are Chairman of the Senate Committee on Education. This rule makes a Bachelor of Science in Nursing (BSN) the minimum requirement for a school nurse in the State of Wisconsin.

I am a school nurse serving 14,000 children in the School District of Waukesha, past president of the Wisconsin Association of School Nurses, a nationally certified school nurse and a certified Public Health Nurse in the State of Wisconsin. I am asking you to consider the following:

- 93% of school nurses currently practicing in the State already have at least a BSN
- Most school districts that employ nurses have a BSN requirement for hiring a school nurse
- Public Health Nurses, our community partners, have a BSN requirement and many of them serve as school nurses in other parts of the State
- School nurses practice in a setting where the minimal preparation for professional staff is a bachelor's degree
- Neighboring states of Minnesota, Illinois and Michigan mandate the hiring of baccalaureate-prepared nurses
- Nurses with lesser credentials working in the schools will be exempt from the requirement
- The BSN standard is recommended by the American Academy of Pediatrics and the National Association of School Nurses

As a school nurse with 29 years of experience, I have mentored student nurses in associate degree (ADN) programs from our local technical college (Waukesha County Technical College). These nursing students spent one day each week for 6 weeks with me. My program in community health at the University of Wisconsin-Milwaukee was an 8 credit, semester-long course that included family systems theory and epidemiology – information critical to working with students and families and the communicable diseases that are a large part of what we deal with in schools.

The care of students with chronic health conditions such as asthma, cerebral palsy, cystic fibrosis, diabetes, seizures, etc., has become increasingly complex. The sophistication and development of treatments and technology for these and other health conditions requires a breadth of educational experience that challenges even my colleagues with a higher level of nursing education – that of a masters degree.

It is time to do more than say that we value the health and safety of our children, it is time to act. This rule would be one step in that direction.

Thank you for your consideration.

Respectfully,

Twyla Lato, RN, BSN, NCSN  
School Nurse

S71 W12461 Berrywood Lane  
Muskego, WI 53150  
414.828.7141 (cell)  
nasm04@sbcglobal.net

"In this time of change, challenge, struggle, learning and action for children; let us overcome our selfishness and greed, our political and personal jockeying, our individual and organizational agendas, our need to be first, right and recognized, and instead become humble in service to children. (adapted from Marian Wright Edelman)



**Stromme, Denise**

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**From:** Jan VanDrisse [jvandrisse3409@charter.net]  
**Sent:** Tuesday, September 21, 2010 7:24 AM  
**To:** Sen.Lehman  
**Subject:** rule 10-058

Dear Sen Lehman,

ADN, Diploma, and BSN nurses all attend certified schools and take the same State Board of Nursing exam. When they passed that exam the State Board of Nursing provided them with a license to work in any nursing setting, including schools because they feel these nurses are qualified.

DPI is over stepping it's boundries when it feels it has sthe right to determine which licensed nurses are qualified to work in the school setting. That determination belongs to the State Board of Nursing.

I strongly oppose requiring schools to hire only BSN nurses.

Sincerely,  
Janice VanDrisse RN





September 21, 2010

CI-Rule 10-058?

Regarding: Department of Public Instruction's (DPI) Proposed Administrative  
Rule: A.D.N.-B.S.N. Debate

Thank you for the opportunity to express my concerns about the Department of Public Instruction's (DPI) proposed administrative rule that would require a minimum of bachelor's degree for a registered nurse to be employed as a public school nurse in Wisconsin.

As Dean of the Center for Health and Safety Education at Madison Area Technical College I would like to make it very clear that I am opposed to this proposed administrative rule.

The Registered Nurse (R.N.) credential for nurses is widely recognized and is held by individuals completing either the Associate Degree in Nursing (A.D.N.) or the Bachelors Degree in Nursing (B.S.N.). Both paths to achieve the R.N. credential are recognized and accepted and there is no empirical evidence that demonstrates differences between the two relative to the quality of patient care and professionalism.

Individuals completing the A.D.N. and the B.S.N. must pass the same national examination in order to become a registered nurse in the state of Wisconsin.



An examination of the pass rates for our A.D.N. graduates reveals that the vast majority exceed the national average and score at higher rates than those testing from a B.S.N. program.


As an administrator for many years in health occupations in both the private and public sectors I struggle to find the rationale behind this proposed rule.

Madison Area Technical College offers over 63 courses in sciences and nursing in a two-year period. Madison Area Technical College's A.D.N. program has a statewide approved curriculum that provides students with training, skills and technical competence in nursing. Students may sit for the national R.N. exam for licensure upon completion of the program.

In closing I would again like to clearly state my opposition to this potential administrative rule. I do not believe that DPI has presented empirical evidence proving that A.D.N. registered nurses are any less qualified than B.S.N. registered nurses.

I whole heartedly stand by our programs and the success our graduates have had serving the community.

Respectfully,

A handwritten signature in black ink that reads "Mark Lausch". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Mark Lausch, Ed.D., MPH, CHES  
Dean, Center for Health and Safety Education  
Madison Area Technical College