

STATE OF NEW JERSEY DEPARTMENT OF EDUCATION

A Memo from the New Jersey Department of Education

Date: March 26, 2025

To: Local Educational Agency Leads, Directors of Approved Private Schools for Students with Disabilities

Route To: Principals, School Nurses, School Physicians, Human Resources

From: Kathy Ehling, Assistant Commissioner Division of Educational Services

Guidance on School Nursing Services: Field Trips, Substitute Coverage, and Compliance Considerations

The New Jersey Department of Education (NJDOE) recognizes the current challenges in ensuring adequate capacity to deliver nursing services in schools. This memo provides guidance on delivering nursing services in public schools and Approved Private Schools for Students with Disabilities (APSSD) while ensuring compliance with relevant regulations. The contents of this memo address some of the most frequent inquiries related to school health and nursing services received by the NJDOE.

Field Trips and School Sponsored Events

When planning and facilitating a field trip or school-sponsored event, districts must account for students' health service needs and associated costs. All field trips and school-sponsored events must comply with applicable federal and state regulations, as well as district policies and procedures.

When an individual student requires health services during a field trip or school-sponsored event, failure to provide those services may constitute a violation of the student's rights under Section 504 of the Rehabilitation Act. Decisions regarding how to meet student health needs should be made collaboratively, involving the student's parents or guardians, healthcare professionals, including the school nurse, and school administrators. N.J.A.C. 6A:16-2.1(a) requires each district board of education to develop policies and procedures for the provision of health services in emergencies and to ensure staff are appropriately informed. When planning and approving field trips or other school-sponsored events, districts must assess in advance whether students will require nursing services, including medication administration or other health-related support. These considerations should be integrated into the district's budgeting process and annual nursing services plan to ensure appropriate coverage.

Additionally, for field trips that take students out of state, school nurses should review the <u>Nurse Licensure</u> <u>Compact (NLC)</u> to determine whether their New Jersey licensure permits them to provide health services in the destination state. Districts should ensure compliance with all applicable licensure requirements and, if necessary, make alternative arrangements for student health services in advance of the trip.

Addressing School Nurse Absences and Substitute Availability

Local educational agencies (LEAs) may encounter challenges in maintaining adequate nursing services when a school nurse is absent. To serve as a substitute school nurse in New Jersey, an individual must hold a valid New Jersey Registered Professional Nurse (RN) license. Licensed Practical Nurses (LPNs) are not eligible to serve as substitute certified school nurses.

Per N.J.A.C. 6A:9B-7.3, individuals holding a substitute school nurse certificate may serve in the same assignment for a maximum of 20 instructional days per school year. Substitute school nurses who hold a standard school

nurse certificate may serve for up to 60 instructional days per school year. If an LEA requires substitute nursing coverage beyond these limits, it must notify the Executive County Superintendent. To ensure continuity of student health services, LEAs may consider the following strategies:

- Develop a robust substitute nursing pool, including active recruitment, competitive pay rates, flexible scheduling, and orientation programs that provide access to and training on local electronic health records.
- Hire per diem, float, or part-time nursing staff to provide additional coverage.
- Contract with a nursing agency to secure appropriately certified substitute school nurses as needed.
- Notify parents when the school nurse is absent, and coverage is unavailable. Notifications should include district policies on medical emergencies and how individual student health needs will be addressed.
- Remind parents of their option to visit the school to administer routine medications.
- Establish agreements with neighboring school districts to share nursing coverage when substitutes are unavailable.
- Partner with a local educational services commission or special services school district to access additional nursing resources.

For questions, please contact <u>healthysch@doe.nj.gov</u>.

c: Members, State Board of Education NJDOE Staff Statewide Parent Advocacy Network Garden State Coalition of Schools NJ LEE Group