

Proposed Amendments at N.J.A.C. 6A:9B, State Board of Examiners and Certification

The following is the accessible version of the proposed amendments at N.J.A.C. 6A:9B. The adoption level document includes three sections – [comments and responses](#), a [summary of the rulemaking](#) and the [rule text of the proposed amendments](#).

**State Board of Education
Administrative Code
Comment/Response Form**

This comment and response form contains comments received since the November 5, 2025, meeting of the State Board of Education when the rulemaking was considered at Proposal Level.

Topic: State Board of Examiners and Certification **Meeting Date:** June 3, 2026

Code Citation: N.J.A.C. 6A:9B **Level:** Adoption

Division: Teaching and Learning Services

Completed by: Office of Recruitment, Preparation, and Certification

Summary of Comments and Agency Responses:

The following is a summary of the comments received from members of the public and the Department of Education's (Department) responses. Each commenter is identified at the end of the comment by a number that corresponds to the following list:

1. Harrison Silver, Legislative Advocate, New Jersey School Boards Association
2. Sheila Caldwell, Registered nurse (RN)
3. Rosemary Catton, RN, Executive Director, New Jersey State School Nurses Association, and adjunct professor in school nurse preparation programs at Rutgers University and William Paterson University
4. Morgan McFayden, RN
5. Elizabeth Yucis, Associate Director, Professional Development and Instructional Issues, New Jersey Education Association

1. **Comment:** The commenter stated that continuous efforts to improve and increase the supply of qualified candidates for school employment are beneficial as long as the efforts do not compromise the quality of the applicant pool and do not result in State-mandated intrusions into the authority of district boards of education. The commenter also stated that all necessary and appropriate steps should be pursued to address the school nurse shortage and to increase the number of candidates who are eligible for the school nurse/non-instructional endorsement. **(1)**

Response: The Department thanks the commenter for the input.

2. **Comment:** The commenter stated the existing requirements for school nurse endorsement, school nurse/non-instructional endorsement, or substitute school nurse/non-instructional credential at N.J.A.C. 6A:9B-7.5, 14.3, and 14.4 include a valid New Jersey registered professional nurse license. The commenter also indicated that New Jersey joined the multistate Nurse Licensure Compact (NLC) and that existing regulations do not permit registered professional nurses licensed through the NLC to work as school

nurses in New Jersey. The commenter expressed support for the proposed amendments at N.J.A.C. 6A:9B-7.5, 14.3, and 14.4 because they would allow holders of multistate registered professional nurse licenses issued by other NLC-member states to become eligible for the school nurse endorsement, school nurse/non-instructional endorsement, and substitute school nurse/non-instructional credential in New Jersey. The commenter indicated that the proposed amendments would help to alleviate the ongoing school nurse shortage by expanding the pool of qualified school nurse candidates without compromising the quality of the applicant pool. **(1)**

Response: The Department appreciates the support.

3. **Comment:** The commenters expressed support for the proposed amendments at N.J.A.C. 6A:9B-7.5, 14.3, and 14.4. **(2, 5)**

Response: The Department appreciates the support.

4. **Comment:** The commenter indicated knowledge of at least 12 candidates who held multistate registered professional nurse licenses issued pursuant to the NLC, including military spouses, and were denied a school nurse endorsement or credential during the past year. The commenter also indicated that the Department's nonacceptance of a multistate registered professional nurse license as meeting the existing requirement that candidates hold a New Jersey registered professional nurse license was an inadvertent oversight since New Jersey's participation in the NLC began in November 2021. **(3)**

Response: The Department appreciates the comment and acknowledges the importance of ensuring consistency between the rules governing school nurse endorsements and New Jersey's participation in the NLC. The proposed amendments at N.J.A.C. 6A:9B-7.5, 14.3, and 14.4 will allow a valid multistate registered professional nurse license issued by an NLC-member state to satisfy the professional nurse license requirement for the endorsements and credential.

5. **Comment:** The commenter expressed appreciation for the Department's leadership and support in advancing high-quality school nursing practice. The commenter indicated that New Jersey has maintained a national reputation for excellence in school nursing. **(3)**

Response: The Department appreciates the support.

6. **Comment:** The commenter stated that New Jersey is currently experiencing a critical shortage of nurses, including school nurses. The commenter stated that the proposed amendments would expand eligibility for school nursing positions to individuals who are currently authorized to practice in New Jersey under a valid multistate registered professional nurse license and would positively impact school districts' ability to employ qualified school nurses, thereby helping to address the ongoing shortage of registered professional nurses. **(3)**

Response: The Department appreciates the support.

7. **Comment:** The commenter expressed appreciation for the Department's communication with the New Jersey Board of Nursing regarding the commenter's petition for rulemaking, which led to this rulemaking. The commenter also expressed gratitude to the Department for recognizing the petition for rulemaking's relevance to N.J.A.C. 6A:9B-14.4 and applying the proposed amendments equally to the school nurse and school nurse/non-instructional endorsements. **(3)**

Response: The Department appreciates the support.

8. **Comment:** The commenter asked whether the proposed amendments would take effect immediately once approved or if there will be a delay in eligible candidates being approved for the school nurse and school nurse/non-instructional endorsements and the substitute school nurse/non-instructional credential. **(4)**
Response: The proposed amendments will be effective upon adoption by the State Board of Education (State Board) and publication of the notice of adoption in the *New Jersey Register*. Publication of a notice of adoption generally occurs the month after the State Board approves a rulemaking at adoption level. On the date the proposed amendments become effective, the Department would process all pending and new applications consistent with the amended regulations and in the normal course of operations. The amendments would not apply retroactively to applications previously denied, but applicants may reapply pursuant to the amended rules.
9. **Comment:** The commenter questioned how the Department is planning to address holders of the multistate registered professional nurse license who come from out-of-State to work in New Jersey but must leave after a year. The commenter indicated that the proposed amendments do not consider the requirements of the New Jersey First Act. The commenter indicated that after one year, a New Jersey resident who is a school nurse could challenge a school district for employing the holder of a multistate professional nurse license whose primary state of residence is not New Jersey. The commenter also expressed concern that hiring out-of-State registered professional nurses may result in additional staff turnover if they are hired, trained, and then subsequently leave New Jersey. The commenter stated that registered professional nurses residing in southern NLC states could relocate and work in New Jersey for a year to earn a higher salary and then move again. The commenter noted that registered professional travel nurses moved to states offering financial incentives during the COVID-19 pandemic and departed once the incentives ended. **(2)**
Response: The Department appreciates the comments, but the New Jersey First Act and the retention of staff once endorsements are issued is beyond the scope of the proposed rulemaking.
10. **Comment:** The commenter stated that the proposed amendments provide a possible option, but registered professional nurses are not applying for, or seeking, school nurse positions because the Department does not offer a mentoring program comparable to that provided to teachers and because school districts are unwilling to offer salaries competitive with hospital hourly rates. The commenter indicated that many registered professional nurses leave school positions due to insufficient training and increasingly complex student health needs, including a growing number of chronically ill, medically fragile, and diabetic students requiring intensive care. **(2)**
Response: The Department appreciates the commenter's statements; however, mentorship and salary incentive programs are outside the scope of this rulemaking.
11. **Comment:** The commenter commended the Department's reinstatement of the State school nurse consultant position because the position was instrumental during the pandemic and continues to benefit school nursing practice in the State. **(3)**
Response: The Department appreciates the commenter's statements; however, they are outside the scope of this rulemaking.
12. **Comment:** The commenter requested that the Department permit five years of school nursing experience to substitute for the academic credit requirements necessary for the

issuance of the school nurse endorsement. (4)

Response: The comment is outside the scope of this rulemaking as there are no proposed amendments relative to credit completion.

13. **Comment:** The commenter stated that legislation with a similar purpose to the proposed amendments has been introduced in both houses of the New Jersey Legislature but has not progressed. (2)

Response: The Department does not comment on pending legislation.



State of New Jersey
DEPARTMENT OF EDUCATION
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Adoption Level
June 3, 2026

MIKIE SHERRILL
Governor
DR. DALE G. CALDWELL
Lt. Governor

DR. LILY LAUX
Commissioner

To: Members, State Board of Education

From: Dr. Lily Laux
Commissioner

Subject: N.J.A.C. 6A:9B, State Board of Examiners and Certification

Reason for Action: Amendments

Authority: N.J.S.A. 18A:4-15 and 18A:40-3.6, 3.7, 3.8, and 3.9; and N.J.A.C. 1:30-4.2(a)3

Sunset Date: April 6, 2030

Summary

The Department of Education (Department) proposes to amend N.J.A.C. 6A:9B, State Board of Examiners and Certification, to expand the type of professional nurse licenses that candidates must hold to be eligible for the school nurse or school nurse/non-instructional endorsements and the substitute school nurse/non-instructional credential. Specifically, the Department proposes to amend N.J.A.C. 6A:9B-7.5, 14.3, and 14.4 to add a valid multistate registered professional nurse license issued by the licensing board of a state that is a member of the Nurse Licensure Compact (NLC) as an option for the required professional license.

The proposed amendments are the result of a petition for rulemaking submitted by Rosemary Catton, R.N., Executive Director of the New Jersey State School Nurses Association. The petitioner requested amendments at N.J.A.C. 6A:9B-7.5 and 14.3 to allow holders of a multistate registered professional nurse license issued by a state board of nursing that participates in the NLC to qualify for a substitute school nurse/non-instructional credential or an educational services certificate with a school nurse endorsement. The petitioner indicated that the NLC allows nurses with a license in one state to practice in other participating states without needing a separate license in each state. New Jersey joined the NLC on November 15, 2021.

In accordance with N.J.S.A. 18A:26-2.3, the Department sought the assistance of the New Jersey State Board of Nursing to discuss the petition, as well as the policies and process related to the multistate registered professional nurse license. The New Jersey Board of Nursing reassured the Department that standards for nurse licensure must be uniform across NLC member states. As an NLC member state, New Jersey fully recognizes a multistate nursing license issued by another NLC member state; therefore, any holder of a multistate is permitted to serve as a registered professional nurse in New Jersey. The New Jersey Board of Nursing also

confirmed that the NLC has a discipline reporting process that can result in an encumbrance on a multistate license or deactivation. The Department will be able to use the publicly available national nurse licensure verification system -- Nursys.com – to verify a candidate’s multistate license and whether the candidate’s license is encumbered and/or deactivated.

After further deliberations and discussing the petition with the New Jersey State Board of Nursing, the Department, on September 22, 2025, granted the petitioner’s request with changes (see 57 N.J.R. 2452(a)). Pursuant to the rules governing petitions for rulemaking at N.J.A.C. 1:30-4.2(a)3, the Department is required to initiate a rulemaking to effectuate the approved request within 90 days of approving a petition.

Therefore, the Department proposes to amend N.J.A.C. 6A:9B-7.5 and 14.3 to add “or, pursuant to P.L. 2019, c. 172, a valid multistate registered professional nurse license issued by the licensing board of a state that is a member of the Nurse Licensure Compact.”

The Department also proposes to amend N.J.A.C. 6A:9B-14.4, which was not included in the petitioner’s request, to apply the same amendment to the school nurse/non-instructional endorsement.

As the Department has provided a 60-day comment period on this notice of proposal, the notice is excepted from the rulemaking calendar requirement, pursuant to N.J.A.C. 1:30-3.3(a)5.

Social Impact

The proposed amendments will have a positive social impact on students, school nurse candidates, and school districts because the proposed amendments will help address school nurse shortages by enabling holders of a valid multistate registered professional nurse license to be eligible for the school nurse endorsement, school nurse/non-instructional endorsement, and substitute school nurse/non-instructional credential. Increasing the pool of registered nurses who are eligible for the endorsements and the credential will ease the burden on school districts to fill open staff positions related to nursing services for students and teaching in areas related to health in preschool through grade 12.

Economic Impact

The proposed amendments will have no financial impact on school districts. Individuals who hold a multistate registered professional nurse license might realize a positive economic impact by being eligible for the school nurse endorsement, school nurse/non-instructional endorsement, and substitute school nurse/non-instructional credential and related positions in school districts.

Federal Standards Statement

The proposed amendments will not be inconsistent with, or exceed, Federal requirements or standards, as there are no Federal requirements or standards related to the requirements for the school nurse endorsement, school nurse/non-instructional endorsement, and substitute school nurse/non-instructional credential.

Jobs Impact

It is not anticipated that jobs will be either generated or lost as a result of the proposed amendments.

Agriculture Industry Impact

The proposed amendments will have no impact on the agriculture industry.

Regulatory Flexibility Statement

The proposed amendments will not change the existing reporting, recordkeeping, or other compliance requirements or place new requirements on small businesses, as defined by the Regulatory Flexibility Act, N.J.S.A. 52:14B-16 et seq. The proposed amendments impact school districts, charter schools, renaissance school projects, and approved private schools for students with disabilities (APSSDs). APSSDs could be considered small businesses, as that term is defined by the Regulatory Flexibility Act at N.J.S.A. 52:14B-17. Therefore, a regulatory flexibility analysis is not required.

Housing Affordability Impact Analysis

There is an extreme unlikelihood that the proposed amendments will have any impact on the affordability of housing in New Jersey. There is an extreme unlikelihood that the proposed amendments would evoke a change in the average costs associated with housing because the proposed amendments concern eligibility requirements for the school nurse endorsement, school nurse/non-instructional endorsement, and substitute school nurse/non-instructional credential.

Smart Growth Development Impact Analysis

The proposed amendments will have an insignificant impact on smart growth. There is an extreme unlikelihood that the proposed amendments would evoke a change in housing production in Planning Areas 1 or 2, or within designated centers, pursuant to the State Development and Redevelopment Plan in New Jersey because the proposed amendments concern eligibility requirements for the school nurse endorsement, school nurse/non-instructional endorsement, and substitute school nurse/non-instructional credential.

Racial and Ethnic Community Criminal Justice and Public Safety Impact

There is an extreme unlikelihood that the proposed amendments would have an impact on pretrial detention, sentencing, probation, or parole policies concerning juveniles and adults in the State because the proposed amendments concern eligibility requirements for the school nurse endorsement, school nurse/non-instructional endorsement, and substitute school nurse/non-instructional credential.

Full text of the proposed amendments follows (additions indicated in boldface **thus**; deletions indicated in brackets [thus]):

6A:9B-7.5 Substitute credential for positions not requiring instructional certificates

(a) The Board of Examiners may issue a substitute school nurse/non-instructional credential to the holder of a valid New Jersey registered professional nurse license **or, pursuant to P.L. 2019, c. 172, a valid multistate registered professional nurse license issued by the licensing board of a state that is a member of the Nurse Licensure Compact.**

1. A substitute school nurse/non-instructional may serve a total of 60 instructional days in the same position in one school district during the school year.

(b) The Board of Examiners may issue a substitute educational interpreter credential to candidates with an associate or higher degree and who have completed the Educational Interpreter Performance Assessment (EIPA) with a minimum score of 3.5 or demonstrated interpreting skills as evidenced through the possession of a sign language certificate from the Registry of Interpreters for the Deaf or other Department-approved national accrediting agency for sign language interpreting. Substitute educational interpreters may serve for up to six months during the academic year.

6A:9B-14.3 School nurse

(a) The school nurse endorsement authorizes the holder to perform nursing services and to teach in areas related to health in public schools in preschool through grade 12.

(b) To be eligible for the standard educational services certificate with a school nurse endorsement, a candidate shall hold or complete the following professional licenses, degrees, certifications, and training:

1. A current New Jersey registered professional nurse license issued by the New Jersey State Board of Nursing **or, pursuant to P.L. 2019, c. 172, a valid**

multistate registered professional nurse license issued by the licensing board of a state that is a member of the Nurse Licensure Compact.

2. A bachelor's degree from an accredited college or university;
 3. A current Cardiopulmonary Resuscitation (CPR) and Automated External Defibrillators (AED) certification as issued by the American Heart Association, the American Red Cross, the National Safety Council, or other entities determined by the Department of Health to comply with the American Heart Association's CPR guidelines; and
 4. Complete training in airway management and in the use of nebulizers and inhalers consistent with nationally recognized standards, including, but not limited to, those of the National Institutes of Health and the American Academy of Allergy, Asthma and Immunology.
- (c) The candidate shall also complete either a Department-approved college curriculum for the preparation of school nurses or a program of studies that is a minimum of 21 semester-hour credits and that includes study in the following topics:
1. A minimum of six semester-hour credits in school nursing, including school health services, physical assessments, organization and administration of the school health program and clinical experience in a school nurse office;
 2. Health assessment;
 3. Special education and/or learning disabilities;
 4. Methods of teaching health in preschool through grade 12 including curriculum development;
 5. Public health, including public health nursing, community health problems, and communicable disease control;

6. Guidance and counseling;
 7. School law, including legal aspects of school nursing; and
 8. Substance abuse.
- (d) During the initial three years of employment under a school nurse endorsement, the holder shall engage in a minimum of 20 hours of professional development in each of the following: human growth and development; substance abuse and dependency; and human and intercultural relations. The professional development requirements shall be incorporated into each endorsement holder's professional development plan, pursuant to N.J.A.C. 6A:9C-3.
- (e) An emergency certificate is not available for the school nurse endorsement.

6A:9B-14.4 School nurse/non-instructional

- (a) The school nurse/non-instructional endorsement authorizes the holder to perform nursing services in public schools in preschool through grade 12. This endorsement does not authorize the holder to teach in areas related to health.
- (b) To be eligible for the standard educational services certificate with a school nurse/non-instructional endorsement, a candidate shall hold or complete the following professional licenses, degrees, certifications, and training:
1. A current New Jersey registered professional nurse license issued by the New Jersey State Board of Nursing **or, pursuant to P.L. 2019, c. 172, a valid multistate registered professional nurse license issued by the licensing board of a state that is a member of the Nurse Licensure Compact;**
 2. A bachelor's degree from an accredited college or university;
 3. A current Providers Cardiopulmonary Resuscitation (CPR) and Automated External Defibrillators (AED) certification as issued by the American Heart

Association, the American Red Cross, the National Safety Council, or other entities determined by the Department of Health to comply with the American Heart Association's CPR guidelines; and

4. Complete training in airway management and in the use of nebulizers and inhalers consistent with nationally recognized standards, including, but not limited to, those of the National Institutes of Health and the American Academy of Allergy, Asthma and Immunology.
- (c) The candidate also shall complete either a Department-approved college curriculum for the preparation of school nurses or a program of studies that is a minimum of 15 semester-hour credits and that includes study in the following topics:
1. A minimum of six semester-hour credits in school nursing, including school health services, physical assessments, organization and administration of the school health program, and clinical experience in a school nurse office;
 2. Health assessment;
 3. Public health, including such areas as public health nursing, community health problems and communicable disease control;
 4. Special education and/or learning disabilities;
 5. Guidance and counseling;
 6. School law, including legal aspects of school nursing; and
 7. Substance abuse.
- (d) During the initial three years of employment under a school nurse/non-instructional endorsement, the holder shall engage in a minimum of 20 hours of professional development in each of the following: human growth and development; substance abuse and dependency; and human and

intercultural relations. The professional development requirements shall be incorporated into each endorsement holder's professional development plan, pursuant to N.J.A.C. 6A:9C-3.

- (e) Upon the executive county superintendent's request, the Office may issue an emergency certificate to a candidate who holds a bachelor's degree from an accredited college or university, a current New Jersey registered professional nurse license **or, pursuant to P.L. 2019, c. 172, a valid multistate registered professional nurse license issued by the licensing board of a state that is a member of the Nurse Licensure Compact**, and current CPR/AED certification. The candidate shall present evidence of study in public health nursing. The study must appear on the transcript of an accredited four-year college or university.