



## Regulation of Pre-license Nursing Education Programs

### Frequently Asked Questions

1. Under what circumstances must a program require a student, who did not report to clinical due to unforeseen circumstances, to make up their missed clinical hours?

The Board of Nursing does not regulate pre-license nursing education program students. Generally, how to best address student clinical absences are within the sole discretion of the education program, as long as any missed clinical experiences are made up in a manner that enables the program to implement its approved curriculum and student progression policy. Chapter 4723-5, OAC, places requirements on the nursing education program that include, but are not limited to, the program's curriculum, minimum qualifications for faculty, teaching assistants and preceptors, supervision of nursing students, and implementation of specific written policies. The program is required by Rule 4723-5-12, OAC, to have policies addressing a student's progression through and completion of the program. The progression policy must include the level of achievement a student must maintain in order to remain in the program, or to progress, and the requirements for satisfactory completion of each course required in the nursing curriculum. When the Board surveys a nursing education program, the program's implementation of its written policies is verified.

2. Is it acceptable to forgo a previously scheduled clinical day (8 hours) when the clinical agency notifies the program it cannot accommodate the student clinical group due to unforeseen circumstances?

Each nursing education programs is required by Rule 4723-5-13, OAC, for registered nurse programs and 4723-5-14, OAC, for practical nurse programs to implement its curriculum that includes an amount of clinical experience hours required by specific courses. It is the program's responsibility to contract clinical agencies to provide the specified number of clinical experience hours to meet the course objectives. There are no circumstances in which a program may choose not to provide the clinical experience hours that are stated in its curriculum for specified courses. Further, Rule 4723-5-04 (E), OAC, requires the Board to place a program on Provisional approval when a program fails to provide clinical experiences.

3. When is a program required to have an associate administrator and what is the relationship of an associate administrator to a program administrator?

Rule 4723-5-09(C)(1), OAC provides that when a program has more than one location, each additional location that is more than sixty miles from the program must be administered by a registered nurse who meets associate administrator qualifications established in Rule 4723-5-10, OAC, for registered nurse programs, and Rule 4723-5-11, OAC, for practical nurse programs. If Registered Nursing Program "A" is located in Columbus, and Program A opens a new location (A2), in Cleveland, then A2 must be administered by a registered nurse who meets the qualifications of Rule 4723-5-10 (A)(2), OAC, and must act at the direction of the Program A administrator. The Board may also require a program administrator to appoint as associate administrator when the distance between the program and its additional location is less than sixty miles after considering the average student census at the locations; the total number of program locations; geographic proximity of locations to one another; and the Board's approval status of the program.

4. What is the Board's authority with respect to the controlling agency of a Board approved pre-license nursing education program?

The Board's authority is over the pre-license nursing education program, ensuring that "the program" meets and maintains all requirements of Chapter 4723-5, OAC. A "controlling agency" is the entity under which an education program is organized and administered, that grants credentials upon completion of a program. Rule 4723-5-03, OAC, requires that the controlling agency notify the Board and provide the Board information (e.g., the name of the program administrator) when the controlling agency plans to implement a change of control of a program at least 30 days prior to the effective date of the change of control. Rule 4723-5-09 requires that if a program administrator vacates the position, the controlling agency must ensure continuity of the administrative responsibilities for the program, including timely notifying the Board of the vacancy and a replacement for the administrator. Rule 4723-5-24 provides that when an education program closes, the controlling agency is responsible for providing for the safekeeping of the program's records, and for notifying the Board if the location of the records changes. Generally, however, from the point that the controlling agency appoints its program's administrator, the administrator is accountable and responsible for all aspects of the program, and the administrator is the person to whom the Board addresses questions pertaining to the program meeting and maintaining the requirements of Chapter 4723-5, OAC. The controlling agency's appointment of a qualified administrator is necessary for the Board's initial approval and continued approval of the pre-license nursing education program. The Board's approval of the program will be affected if the

controlling agency fails to appoint a qualified administrator or fails to timely appoint a qualified administrator to a vacated position.

5. Many of our contracted clinical sites require our faculty and students to complete its institution-specific computer training as a condition of our clinical site use. Can this time be counted toward our curriculum clinical hours? It would seem that it should be allowed, since it is required by the clinical institution, and Rule 4723-5-20, (C)(5), OAC, requires the program to provide an orientation of each student to the clinical site.

A program's provision of student orientation to a clinical site is not the same as a student engaging in clinical experience to meet a course's clinical objectives. Rule 4723-5-20 (C)(3), OAC, *Responsibilities of faculty, teaching assistants, and preceptors in a clinical setting*, states that the faculty member providing direction shall "[p]rovide for orientation of each student **to the clinical site**, including introduction to staff." [emphasis added] This faculty-directed clinical site orientation is not included in Rule 4723-5-13, OAC, *Curriculum for registered nurse program*, nor Rule 4723-5-14, OAC, *Curriculum for practical nurse program*. These curriculum rules, and not Rule 4723-5-20, OAC, establish the program's minimum curriculum requirements, including but not limited to the number of clinical experience hours determined by the program through which students achieve the clinical course objectives and progress within the program. The term "clinical experience" as defined in Rule 4723-5-01 (E), OAC, "means an activity planned to meet course objectives or outcomes and to provide a nursing student with the opportunity to practice cognitive, psychomotor, and affective skills in the supervised delivery or nursing care to an individual or group of individuals who require nursing care." The activities that may be counted towards "clinical hours" are dependent on whether the activity is planned to meet the clinical course objectives in a structured setting and meet the definition of "clinical experience."

6. I am new to the role of nursing education program administrator. What information can the Board provide me with respect to my responsibilities?

The Board provides a workshop twice a year to update program administrators and/or their representatives on changes to Chapter 4723-5, OAC, and other law and rules enforced by the Board that may affect programs. The Board provides contact emails through which questions to the various units or programs of the Board may be addressed. For a complete email contact list, please refer to the Board's website: [www.nursing.ohio.gov](http://www.nursing.ohio.gov) and access the "Contact the Board" link. The role of the Board with respect to pre-license nursing education programs is to ensure that nursing education programs that prepare individuals to apply for and attempt the NCLEX-RN or NCLEX-PN meet the law and rules for pre-license nursing education programs, specifically Chapter 4723-5, OAC. As a registered nurse appointed by a controlling agency to administer a

program, it is your responsibility to ensure you are qualified and prepared for the role.

7. Can I substitute a percentage of a course's stated clinical clock hours with a computerized simulation experience, since these experiences are very life-like and effective according to the NCSBN's Simulation Study published in 2014?

Programs may use simulation for its students' to meet a course's outcomes and objectives, but the hours in simulation must be identified as "laboratory experience," and any amount of clinical experience hours identified for a course must be provided in the stated amount. The definition of "laboratory experience" (Rule 4723-5-01(Q), OAC) includes the use of computerized models and simulator programs. The definition of "clinical experience" (Rule 4723-5-01(E), OAC) is the delivery of nursing care to individuals who require nursing care. The number of clinical experience and laboratory experience hours included in a program curriculum is determined by each program, as Chapter 4723-5, OAC, does not establish minimum numbers of hours. However, the number of clinical experience and laboratory experience hours determined by a program must be accurately identified in the program's curriculum plan that is distributed to each student as well as in each applicable course syllabus. A program's stated clinical experience hours cannot be replaced with "simulation" or any other activity that does not meet the definition of "clinical experience."

8. I teach the required curriculum content for IV therapy in my pre-license practical nurse program. To teach this course effectively, I need to fully understand authorized practice for an LPN who is IV therapy certified. How can I accomplish this?

The authority for LPNs with IV therapy certification to perform IV therapy is established in Section 4723.18, Ohio Revised Code, and in Chapter 4723-17, OAC. Specific questions with respect to licensed nursing practice, that include but are not limited to IV therapy should be directed by email to [practice@nursing.ohio.gov](mailto:practice@nursing.ohio.gov).