

**Policy 5100: Approval of Educational Personnel Preparation Programs  
Comment Log**

**Open for Public Comment September 13, 2013 through 4:00 p.m. on October 15, 2013.**

Action  
 N: No Response  
 NA: Not Accepted  
 A: Accepted

Type  
 - Negative  
 + Positive  
 o Neutral

Date	Individual/Organization	Comments	Action/ Type	Rationale
10/11/13	Name: Bobbi Miller Organization: Berkeley Co. Schools Title: RN,BSN City/State: Martinsburg, WV Role: School System Staff	Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure ----- Thank you in advance for the opportunity to express public comments on this issue. As a seasoned nurse, I feel that the PRAXIS exam holds no value to practice as a school nurse. Nurses are required to pass the state license exam and have to meet state requirements for annual renewal. It is without a doubt that the nurses in the public school system are here because of their love of children and nursing, and this cannot be measured by the PRAXIS!	N/+	Comment is in support of the revised language
10/11/13	Name: Suzy Joran Organization: Jefferson County Board of Ed Title: School Nurse City/State: Charles Town, WV Role: Professional Support	Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure ----- Having a Registered Nurse take the Praxis exam is a waste of time and money. This exam is for educators not nurses. I already took a very hard exam to earn	N/+	Comment is in support of the revised language

		<p>my RN license. The Praxis does not in any way help me do the one thing that I was hired to do, and that is take care of the students in WV. It is more important that I calculate medication dosages correctly than know how to figure out a problem in algebra. The other downside to this requirement is that I cannot receive more pay with AB plus 15 because I am not a WV Certified School Nurse. That is so unfair. I took the Praxis over the summer and exceeded the passing score in reading and writing, but did not pass the math portion by a hair. Now I have to spend more time studying for this very difficult math that I will never use, and more money to re-take that portion of the Praxis. At least if I were in VA, I would have passed because they average all the scores; not so in WV. Please, please, remove this ridiculous, unnecessary requirement for an RN to have to do. Our NCLEX exam to become a Registered Nurse, again, should totally suffice. Thank you for allowing me to finally get this off my chest.</p>		
10/11/13	<p>Name: Melissa Dittman  Organization: Berkeley County Schools  Title: Registered Nurse  City/State: Martinsburg, WV  Role: Professional Support</p>	<p>Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure</p> <p>-----</p> <p>For nurses, having to pass the PRAXIS does not have any bearing on providing the best and most optimal health care to students of Berkeley County Schools. The BSN requirement and having to pass the state licensure exams (NCLEX) comes with a requirement of exceptional knowledge of the practice of nursing in all settings. There is no benefit for school nurses to take the PRAXIS exam as it contains no medical or nursing related information. The only other thing</p>	N/+	Comment is in support of the revised language

10-12-13	<p>Name: Ashley  Organization:  Title:  City/State: , WV  Role: Community Member</p>	<p>that nurses need once obtaining BSN is on the job experience. There is no benefit for school nurses in taking the PRAXIS exam and we are asking that it be removed as a requirement for the certification of school nurses because it does not apply to this profession and it is a deterrent for anyone interested in working in school health, thus leaving the nursing shortage for school health that much greater. Thank you for your consideration and I truly believe that removing the PRAXIS requirement for school nurses would provide a greater and possibly more experienced option for employers.</p>	NA/0	<p>Comment would require a fiscal note increase if accepted. West Virginia established a one year grace period for applicants during this transition period. Due to the discontinuation of the previously required exam and the implementation of a newly required exam, students are required to take the exam, but not meet a minimum national cut score. While a national cut score has already been established, it is standard procedure for a West Virginia specific cut score to be established for the new exam.</p>
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10-14-13	<p>Name: Christa Megargee  Organization: Berkeley County Schools  Title: Nurse  City/State: Martinsburg, WV  Role: Professional Support</p>	<p>Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure  -----  As an RN, we are thoroughly tested throughout our schooling and have to pass the NCLEX before obtaining our license. This is a specific test to our education, training, and career as a nurse. The PRAXIS is not geared toward our specialization and does not prepare nurses to provide medically necessary services to school children.</p>	N/+	Comment is in support of the revised language
10-14-13	<p>Name: Jennifer P Busey, RN, BSN  Organization: Berkeley Co schools  Title: School Nurse  City/State: Martinsburg, WV  Role: Professional Support</p>	<p>Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure  -----  As a Registered Professional Nurse for twenty years, I do not feel the PRAXIS exam is necessary to support the health needs of our students. RN's must pass a difficult exam in order to practice as a Registered Nurse. School Nurses also must take the School Certification course and pass an exam to be certified. The PRAXIS deters potential nurses that have experience in their profession from becoming School Nurses. Please consider removing this as a requirement so that those of us who are experienced and well educated can serve our students health needs.</p>	N/+	Comment is in support of the revised language
10-14-13	<p>Name: Mary Jane Rinard  Organization: Berkeley County Schools</p>	<p>Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved</p>	N/+	Comment was in support of revised language.

	<p>Title: Lead Nurse City/State: Martinsburg, WV Role: Professional Support</p>	<p>Programs Leading to West Virginia Licensure ----- I support this change. School Nurse requirements include holding a license as a registered nurse. The RN has passed a licensing exam from the state and should not be required to take PRAXIS to become WVDE school nurse certified. In hiring nurses with years of experience, many nurses are intimidated and reluctant to again participate in such standardized testing, but they have great credentials by virtue of years of experience in nursing. We want them as nurses for our students.</p>		
<p>10-15-13</p>	<p>Name: Janis Wertman Organization: Berkeley Co Board of Ed Title: RN School Nurse City/State: Martinsburg, WV Role: School System Staff</p>	<p>Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure ----- Please reconsider the rule requiring certified school nurse candidates to take and pass the Praxis exam. They already have completed a BSN program and have passed the state RN licensing exam which is quite rigorous. This should be enough to meet the high standard of maintaining the health of our students.</p>	<p>N/+</p>	<p>Comment is in support of the revised language</p>
<p>10/15/13</p>	<p>Name: Lora Crowell, BSN, MA, NCSN Organization: Berkeley Co. Schools Title: School Nurse City/State: Martinsburg, WV Role: Professional Support</p>	<p>Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure ----- The WV State Board of Registered Nurses requires passing a RN licensing exam to assure entry level competence to practice as a RN in WV. In addition, to be a competent school nurse the following is vital: 1)</p>	<p>N/+</p>	<p>Comment is in support of the revised language</p>

		<p>Obtaining a BSN. 2) Continuing school health education through an approved college's School Nurse certification program. 3) Clinical/work experience as a RN in a hospital or public health setting before working as a school nurse. The PRAXIS exam does NOT measure nursing competence. Conversely, competent/experienced nurses have decided NOT to accept employment as a school nurse because the PRAXIS is another expense. In this era of nursing shortage, it is important to have criteria that measures competence and enhances recruitment of qualified personnel. The PRAXIS is not an appropriate measure of nursing competence.</p>		
<p>Diana Dunn, Program Coordinator – Sr. Fairmont State University</p>		<p>Technology Education is not reflected in the Appendix E. Without this endorsement area, students who are currently enrolled in Fairmont State University's approved Technology Education program will not be eligible for licensure in West Virginia. Please explain why this endorsement was removed from policy and add it back to the Appendix E if possible.</p>	<p>A+</p>	<p>A comment from Fairmont University revealed that the Technology Education endorsement was erroneously removed from policy during the previous policy revision. Without the inclusion of this endorsement area, students currently enrolled in FSU's approved program would not be eligible to be recommended for endorsement in this area upon meeting graduation requirements. Technology Education 5-AD was added to the Appendix E.</p>

**Dr. Monica Beane**

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**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Friday, October 11, 2013 9:09 AM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-11 09:09:17)

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Comment Received for Policy 5100

#####

Name: Bobbi Miller  
Organization: Berkeley Co. Schools  
Title: RN,BSN  
City/State: Martinsburg, WV  
Role: School System Staff  
Posted: 2013-10-11 09:09:17  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

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Thank you in advance for the opportunity to express public comments on this issue. As a seasoned nurse, I feel that the PRAXIS exam holds no value to practice as a school nurse. Nurses are required to pass the state license exam and have to meet state requirements for annual renewal. It is without a doubt that the nurses in the public school system are here because of their love of children and nursing, and this cannot be measured by the PRAXIS!

**Dr. Monica Beane**

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**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Friday, October 11, 2013 9:47 AM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-11 09:46:51)

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Comment Received for Policy 5100

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Name: Suzy Joran  
Organization: Jefferson County Board of Ed  
Title: School Nurse  
City/State: Charles Town, WV  
Role: Professional Support  
Posted: 2013-10-11 09:46:51  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

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Having a Registered Nurse take the Praxis exam is a waste of time and money. This exam is for educators not nurses. I already took a very hard exam to earn my RN license. The Praxis does not in any way help me do the one thing that I was hired to do, and that is take care of the students in WV. It is more important that I calculate medication dosages correctly than know how to figure out a problem in algebra. The other downside to this requirement is that I cannot receive more pay with AB plus 15 because I am not a WV Certified School Nurse. That is so unfair. I took the Praxis over the summer and exceeded the passing score in reading and writing, but did not pass the math portion by a hair. Now I have to spend more time studying for this very difficult math that I will never use, and more money to re-take that portion of the Praxis. At least if I were in VA, I would have passed because they average all the scores; not so in WV. Please, please, remove this ridiculo!

us, unnecessary requirement for an RN to have to do. Our NCLEX exam to become a Registered Nurse, again, should totally suffice. Thank you for allowing me to finally get this off my chest.

**Dr. Monica Beane**

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**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Friday, October 11, 2013 10:24 AM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-11 10:23:48)

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This is an encrypted URL. Please Bookmark it.

Comment Received for Policy 5100

#####

Name: Melissa Dittman  
Organization: Berkeley County Schools  
Title: Registered Nurse  
City/State: Martinsburg, WV  
Role: Professional Support  
Posted: 2013-10-11 10:23:48  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

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For nurses, having to pass the PRAXIS does not have any bearing on providing the best and most optimal health care to students of Berkeley County Schools. The BSN requirement and having to pass the state licensure exams (NCLEX) comes with a requirement of exceptional knowledge of the practice of nursing in all settings. There is no benefit for school nurses to take the PRAXIS exam as it contains no medical or nursing related information. The only other thing that nurses need once obtaining BSN is on the job experience. There is no benefit for school nurses in taking the PRAXIS exam and we are asking that it be removed as a requirement for the certification of school nurses because it does not apply to this profession and it is a deterrent for anyone interested in working in school health, thus leaving the nursing shortage for school health that much greater. Thank you for your consideration and I truly believe that removing the PRAXIS requirement for school nurses would !  
provide a greater and possibly more experienced option for employers.

**Dr. Monica Beane**

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**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Saturday, October 12, 2013 4:52 PM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-12 16:52:28)

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Comment Received for Policy 5100

#####

Name: Ashley  
Organization:  
Title:  
City/State: , WV  
Role: Community Member  
Posted: 2013-10-12 16:52:28  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

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I do not believe that student teachers of the graduating class of 2014 should be required to pay for the Teaching Reading exam that has just been added when their scores are only being used to determine if the baseline is acceptable. Since they are doing a service for you, I believe that they should be compensated in some way (i.e not having to pay for the exam).

**Dr. Monica Beane**

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**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Monday, October 14, 2013 8:31 AM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-14 08:31:24)

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Comment Received for Policy 5100

#####

Name: christa megargee  
Organization: berkeley county schools  
Title: Nurse  
City/State: martinsburg, wv  
Role: Professional Support  
Posted: 2013-10-14 08:31:24  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

-----  
As an RN, we are thoroughly tested throughout our schooling and have to pass the NCLEX before obtaining our license. This is a specific test to our education, training, and career as a nurse. The PRAXIS is not geared toward our specialization and does not prepare nurses to provide medically necessary services to school children.

**Dr. Monica Beane**

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**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Monday, October 14, 2013 10:24 AM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-14 10:24:13)

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Comment Received for Policy 5100

#####

Name: Jennifer P Busey, RN, BSN  
Organization: Berkeley Co schools  
Title: School Nurse  
City/State: Martinsburg, WV  
Role: Professional Support  
Posted: 2013-10-14 10:24:13  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

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As a Registered Professional Nurse for twenty years, I do not feel the PRAXIS exam is necessary to support the health needs of our students. RN's must pass a difficult exam in order to practice as a Registered Nurse. School Nurses also must take the School Certification course and pass an exam to be certified. The PRAXIS deters potential nurses that have experience in their profession from becoming School Nurses. Please consider removing this as a requirement so that those of us who are experienced and well educated can serve our students health needs.

**Dr. Monica Beane**

---

**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Monday, October 14, 2013 10:52 AM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-14 10:52:18)

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Comment Received for Policy 5100

#####

Name: Mary Jane Rinard  
Organization: Berkeley County Schools  
Title: Lead Nurse  
City/State: Martinsburg, WV  
Role: Professional Support  
Posted: 2013-10-14 10:52:18  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

-----  
I support this change. School Nurse requirements include holding a license as a registered nurse. The RN has passed a licensing exam from the state and should not be required to take PRAXIS to become WVDE school nurse certified. In hiring nurses with years of experience, many nurses are intimidated and reluctant to again participate in such standardized testing, but they have great credentials by virtue of years of experience in nursing. We want them as nurses for our students.

**Dr. Monica Beane**

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**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Tuesday, October 15, 2013 10:23 AM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-15 10:22:34)

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Comment Received for Policy 5100

#####

Name: Janis Wertman  
Organization: Berkeley Co Board of Ed  
Title: RN School Nurse  
City/State: Martinsburg, WV  
Role: School System Staff  
Posted: 2013-10-15 10:22:34  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

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Please reconsider the rule requiring certified school nurse candidates to take and pass the Praxis exam. They already have completed a BSN program and have passed the state RN licensing exam which is quite rigorous. This should be enough to meet the high standard of maintaining the health of our students.

**Dr. Monica Beane**

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**From:** Nobody <nobody@kryten.wvnet.edu>  
**Sent:** Tuesday, October 15, 2013 12:55 PM  
**To:** mbeane@access.k12.wv.us  
**Subject:** Comment Received for Policy 5100 (2013-10-15 12:54:47)

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Comment Received for Policy 5100  
#####  
Name: Lora Crowell, BSN, MA, NCSN  
Organization: Berkeley Co. Schools  
Title: School Nurse  
City/State: Martinsburg, WV  
Role: Professional Support  
Posted: 2013-10-15 12:54:47  
Posted from IP:

Comments for section 126-114 Appendix E Approved Standards for Program Development and Required Tests for Completion of West Virginia Approved Programs Leading to West Virginia Licensure

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The WV State Board of Registered Nurses requires passing a RN licensing exam to assure entry level competence to practice as a RN in WV. In addition, to be a competent school nurse the following is vital: rn1) Obtaining a BSN. rn2) Continuing school health education through an approved college's School Nurse certification program. rn3) Clinical / work experience as a RN in a hospital or public health setting before working as a school nurse. rnrnThe PRAXIS exam does NOT measure nursing competence. Conversely, competent / experienced nurses have decided NOT to accept employment as a school nurse because the PRAXIS is another expense. In this era of nursing shortage, it is important to have criteria that measures competence and enhances recruitment of qualified personnel. rnrnThe PRAXIS is not an appropriate measure of nursing competence.

Robert,

Looking at 5202 I don't see a Praxis exam listed for the Technology Education program. Was that missed or did something change?

thanks

*Diana Dunn*

*Program Coordinator-Sr.*

*304-367-4242*

*304-367-4599 (fax)*

*Fairmont State University*

*340ED*

Technology Education is not reflected in the Appendix E. Without this endorsement area, students who are currently enrolled in Fairmont State University's approved Technology Education program will not be eligible for licensure in West Virginia. Please explain why this endorsement was removed from policy and add it back to the Appendix E if possible.