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Date: January 24, 2024

To: Hon. Virginia Lyons, Chair
Senate Committee on Health and Welfare

From: Lauren Layman, General Counsel, Office of Professional Regulation
Shiela Boni, Executive Officer, Vermont Board of Nursing, Office of Professional Regulation

Re: S.211 proposed amendment to 26 V.S.A. § 1574

Dear Committee,

Thank you for the opportunity to testify regarding the draft legislation, S.211, related to the proposed amendment to 26 V.S.A. § 1574 requiring the Vermont Board of Nursing to establish a Student Nurse Apprenticeship Program.

The mission of the Office of Professional Regulation is to protect the public from incompetent or unethical practitioners through a system of licensure. We achieve this by supporting boards and advisor groups that oversee licensure of 51 professions and approximately 80,000 licensees.

OPR and the Board of Nursing are committed to partnering with our legislative colleagues to reduce barriers to licensure through legislation that mobilizes a competent workforce without compromising our mission of public protection. Examples of recent successes include the passage and implementation of the Nurse Licensure Compact, revisions to the Nursing Administrative Rules to provide additional pathways for licensure renewal, and the introduction of provisional licensure for initial and endorsement applicants who have met competency requirements to enable them to start their practice in Vermont expeditiously. These legislative actions were accomplished with active participation of a broad group of nursing stakeholders to ensure a comprehensive assessment of the impact of proposed changes.

Before action is taken on the proposed changes to 26 V.S.A. § 1574, we are appreciative of the opportunity to share some challenges we have identified and to propose an alternative approach to addressing the interest in establishing a student nurse apprenticeship program in Vermont.

Background

Apprenticeship models for nursing education date as far back as Florence Nightingale following the Crimean War. While apprenticeships provided some standardization of preparation for the practice of nursing, they lacked a foundation in specific knowledge, as well as adequate supervision and evaluation of student/apprentice practice. Ultimately, the academic model was introduced and accepted as a preferred method of ensuring critical thinking and the application of science was included with adequate supervision and evaluation of clinical experience for nursing education.

A resurgence of interest in student nurse apprenticeships has recently emerged as a means of addressing projected nursing workforce shortages. There are some challenges we have identified that we believe are important to explore before concluding that establishing a statutory requirement for a student nurse apprenticeship program is appropriate at this time.

Challenges

The establishment of a student nurse apprenticeship program, without further consideration, would pose a number of challenges and would potentially result in unintended, undesirable outcomes. For example,

- Poor outcomes for Vermont patients who do not receive care from verified, entry-level, competency-based and trained nurse clinicians;
- Student nurses who may not have enough guidance or supervision resulting in students being overwhelmed, discouraged, or disenfranchised within the profession;
- Limited access to clinical rotations for nursing students due to apprenticeships;
- Overwhelming faculty who already must oversee preceptors, student apprentices, and clinical experiences to ensure the didactic training objectives and national accreditation standards are met;
- Potential for overwhelming nursing staff who would be required to precept nursing student apprentices in addition to new hires;
- Disrupting and potentially impeding Vermont nursing education programs and their accreditation.

Before a statutory change is made that would require a student nurse apprenticeship program, OPR and the Board of Nursing would like an opportunity to learn from other jurisdictions and to fully engage our Vermont partners, subject matter experts, professionals, and constituents to determine if such a program would be sustainable or achieve the intended outcomes.

Recommendation

To date, OPR and other Vermont stakeholders have not been consulted on the establishment of a student nurse apprenticeship. It OPR's hope that, if the Committee wishes to pursue further consideration of a student nurse apprenticeship program, S. 211 be revised to require a study of the impacts of such a program.

If approved, the study would engage with Vermont partners, including Vermont nurses, the Vermont Board of Nursing, the Vermont State Nursing Association, ANA-VT, faculty and

Administrators from Vermont Schools of Nursing, student nurses, our Vermont hospitals, and others. This extended study will also allow OPR the opportunity to review and consider the outcomes of nursing apprenticeship programs in other states that are just beginning to train students. Through discussion with stakeholders and this further research, OPR will be able to make recommendations about (a) whether an apprenticeship program will achieve the stated goals of growing the workforce while protecting the public, and (b) if so, how to establish such a program in a manner that best serves Vermont's patients and our nurse community. Proposed model legislative language for such a study is attached.

Thank you again for this opportunity to discuss S. 211 and the proposed student nursing apprenticeship program. We greatly appreciate your time and attention to this matter.

Proposed Legislative Language

Sec. XX. OFFICE OF PROFESSIONAL REGULATION; STUDENT NURSE APPRENTICESHIP PROGRAM; REPORT

On or before December 15, 2025, the Office of Professional Regulation and the Vermont Board of Nursing, in consultation with relevant stakeholders, shall report to the Senate Committee on Health and Welfare and the House Committee on Health Care a review of student nurse apprenticeship programs, including an evaluation of such programs in other states; whether such a program can be established in Vermont in a manner that protects Vermont's patients, promotes workforce goals, and ensures adequate education and training of student nurses; and, if implemented, how to integrate such a program into Vermont's education, health care, and licensing systems.

