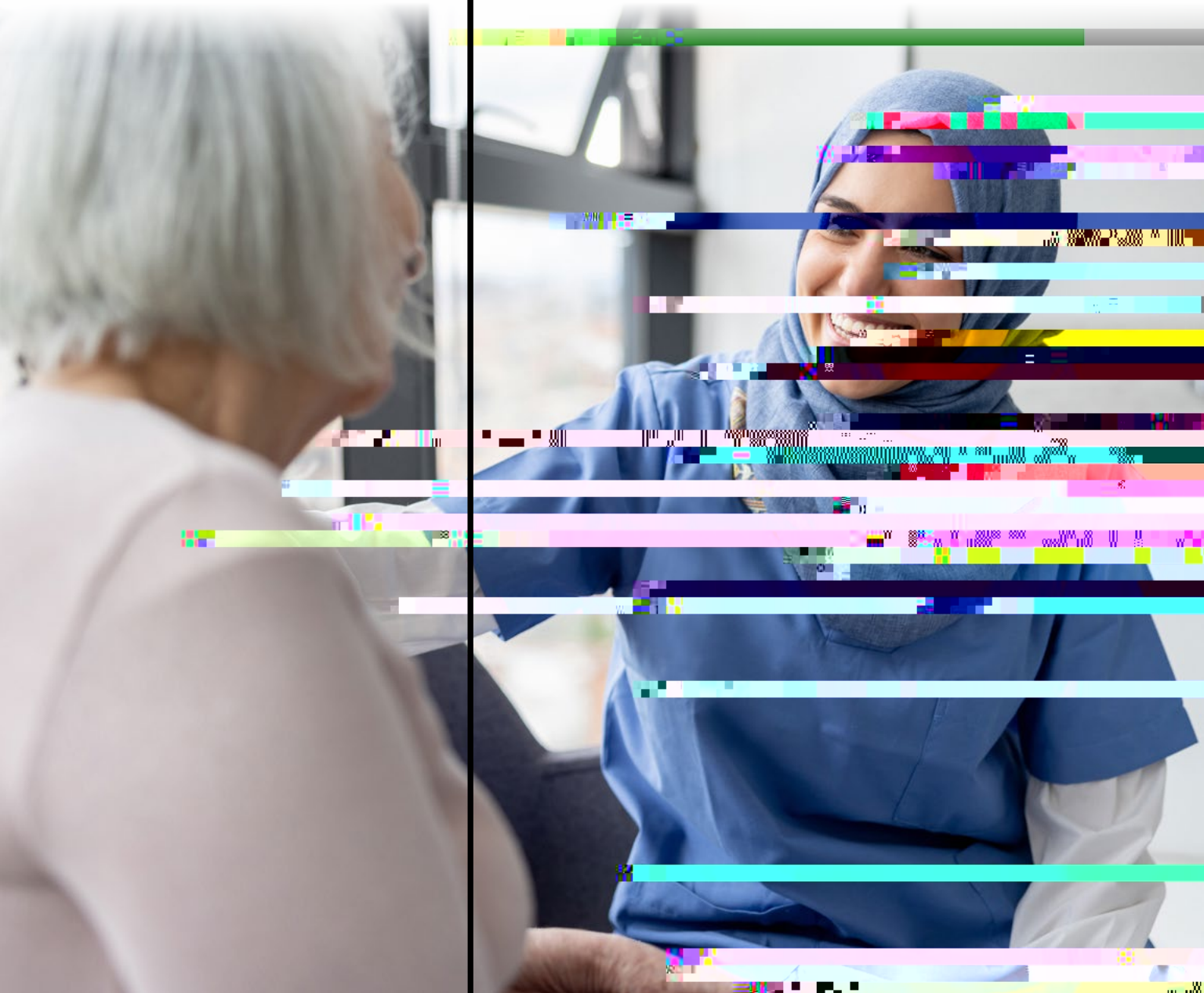




Licensure of Internationally Educated Nurses

A Resource Manual

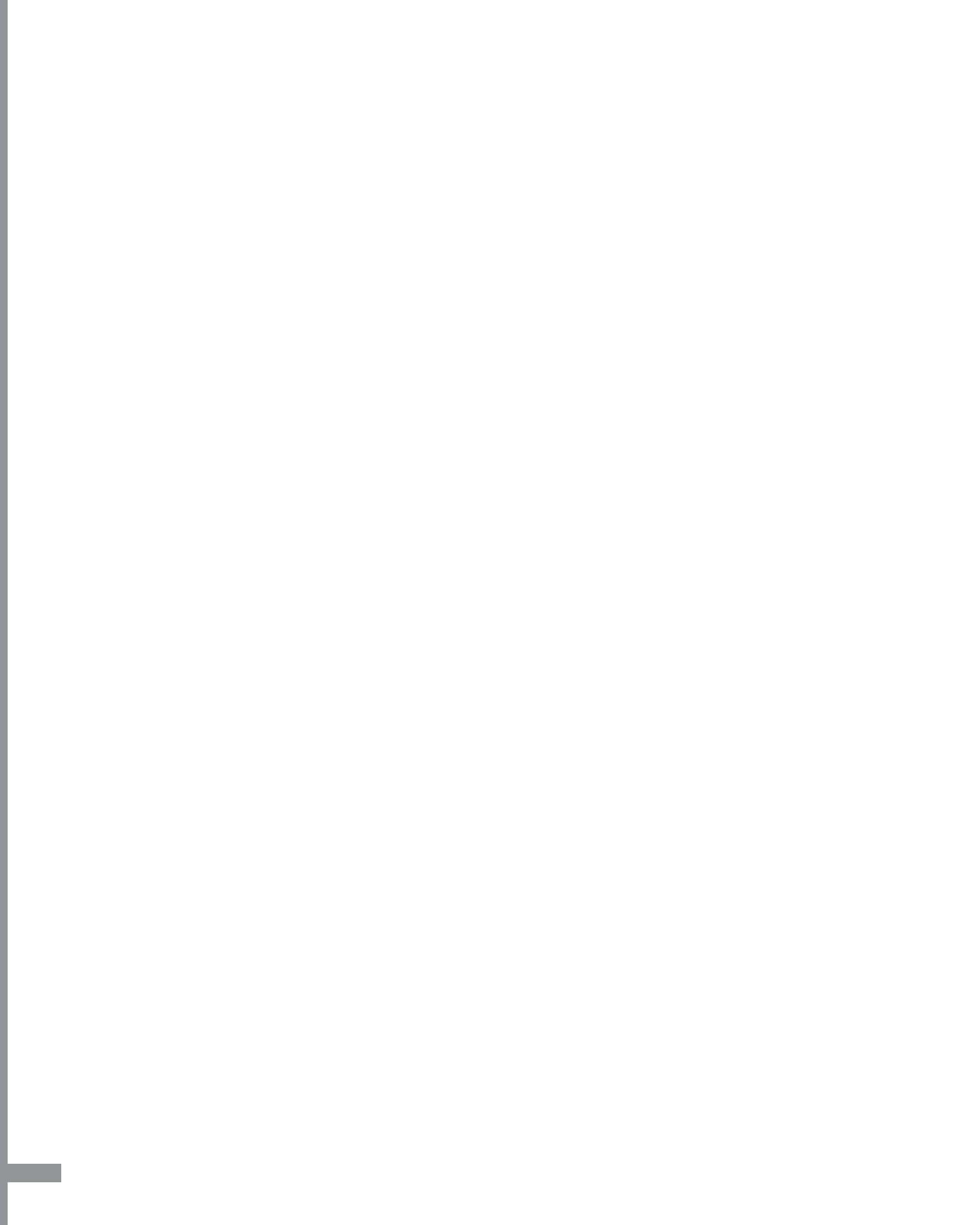


Founded March 15, 1978, as an independent not-for-profit organization, NCSBN was created to lessen the burdens of state governments and bring together boards of nursing (BONs) to act and counsel together on matters of common interest. NCSBN's membership is comprised of the BONs in the 50 states, the District of Columbia, and four U.S. territories — American Samoa, Guam, Northern Mariana Islands and the Virgin Islands. There are also 24 associate members that are either nursing regulatory bodies or empowered regulatory authorities from other countries or territories.

Mission: NCSBN provides education, service and research through collaborative leadership to promote evidence-based regulatory excellence for patient safety and public protection.

The statements and opinions expressed are those of NCSBN and not the individual member state or territorial boards of nursing.

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Using this Manual

NCSBN developed the uniform licensure requirements to provide boards of nursing (BONs) with a standardized set of criteria for making licensure decisions in order to assure that all nurses, whether educated domestically or abroad, are safe and qualified to practice.

This manual provides a detailed guide to each of the uniform licensure requirements for internationally educated nurses (IENs) and additional information that may be useful in specific circumstances. This includes:

- The uniform licensure requirements for IENs;
- Definition of terms;
- Guidelines for selecting a credentials evaluation agency to determine comparability of a foreign program;
- Information on international locations that offer the NCLEX-RN® and NCLEX-PN® Examinations;
- Resources for verifying the licensure status of an IEN in his/her country of origin;
- Information about English proficiency examinations;
- Information on criminal background checks (CBC) and the visa process for IENs; and
- Fraud prevention information from both a BON and credentials evaluation agency perspective.

Definitions

1. **Credentials evaluation**
2. **First-level nurse:**
3. **Internationally educated nurse**
4. **Second-level or enrolled nurse:**

Applicant Responsibility	Board Responsibility
Nursing Education Requirements of International Candidates ¹ : Registered Nurse (RN) and Licensed Practical/Vocational Nurse (LPN/VN)	
	<ul style="list-style-type: none"> ▪ ▪
NCLEX Requirements	
Additional Requirements for International Candidates	
<ul style="list-style-type: none"> ▪ ▪ 	<ul style="list-style-type: none"> ▪ ▪
Additional Public Protection Requirements: Criminal Background Checks	
<ul style="list-style-type: none"> ▪ ▪ 	<ul style="list-style-type: none"> ▪ ▪

Applicant Responsibility	Board Responsibility
Additional Public Protection Requirements: Substance Use Disorders	
Additional Public Protection Requirements: Other Licenses, Certifications, Registrations	

Graduation from a Comparable Nursing Program

Investigation

- The agency requires original transcripts, syllabi or course descriptions, diplomas and licenses in their original language; sent directly from the issuing institution, not from the applicant.

Sample Evaluation Report



ABC Evaluations, Inc.
123 Main Street, Greenville, CO

Report Prepared For: National Council of State Boards of Nursing

Applican Name: Jane Doe

Date of Birth: January 1, 1970

Other Names: Jane Smith

Country of Study: Philippines

Purpose of Evaluation: Professional Licensure

Name of Institution: University School of Nursing

Approval: Level III Accreditation by the Philippine Accrediting Association of Schools,
Colleges and Universities

Program of Study: General Nursing

Requirements for Entry: A general diploma, which shows proficiency in English language and mathematics;
an interview and proficiency test are also required for entry.

Length of Study: Three years

Successful Completion of the NCLEX-RN® or NCLEX-PN® Exam

Self-disclosure of Nursing Licensure in Country of Origin

Australia: _____

Brazil: _____

Canada:

- _____
- _____
- _____
- _____
- _____

France: _____

Hong Kong: _____

Hungary: _____

Ireland: _____

Italy: _____

Mexico: _____

Philippines: _____

Mexico: _____

Italy: _____

Self-disclosure of All Misdemeanors, Felonies and Plea Agreements

Canadian Jurisdictions

Other Jurisdictions

Additional Information

The Visa Process for IENs

Health care worker certification.

Employee sponsor.

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Credentials Evaluations and Fraud Prevention

Presently, more than 230,000 FENs are employed by our hospitals¹. These numbers stress the importance of ensuring that the credentials of our FENs are valid and representative of the training completed abroad, so that a proper assessment can then be made for comparability within the U.S.

Advances made in the internet and printing technology, combined with unstable political or economic climates, increase the risk of fraud. And yet the inverse of this trend can be found where credentials from diploma mills are concerned. As such, it is important to be able to examine the original academic records

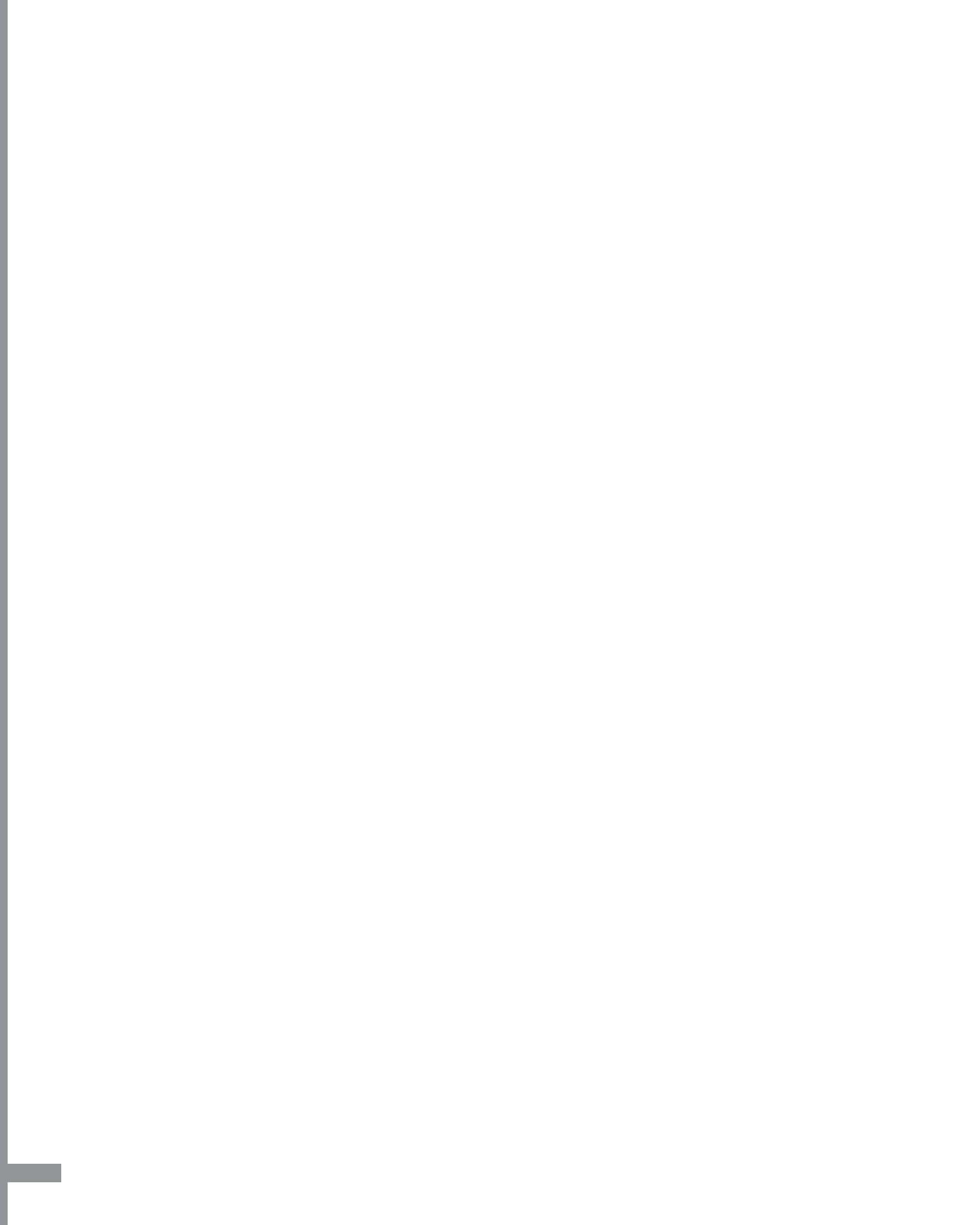
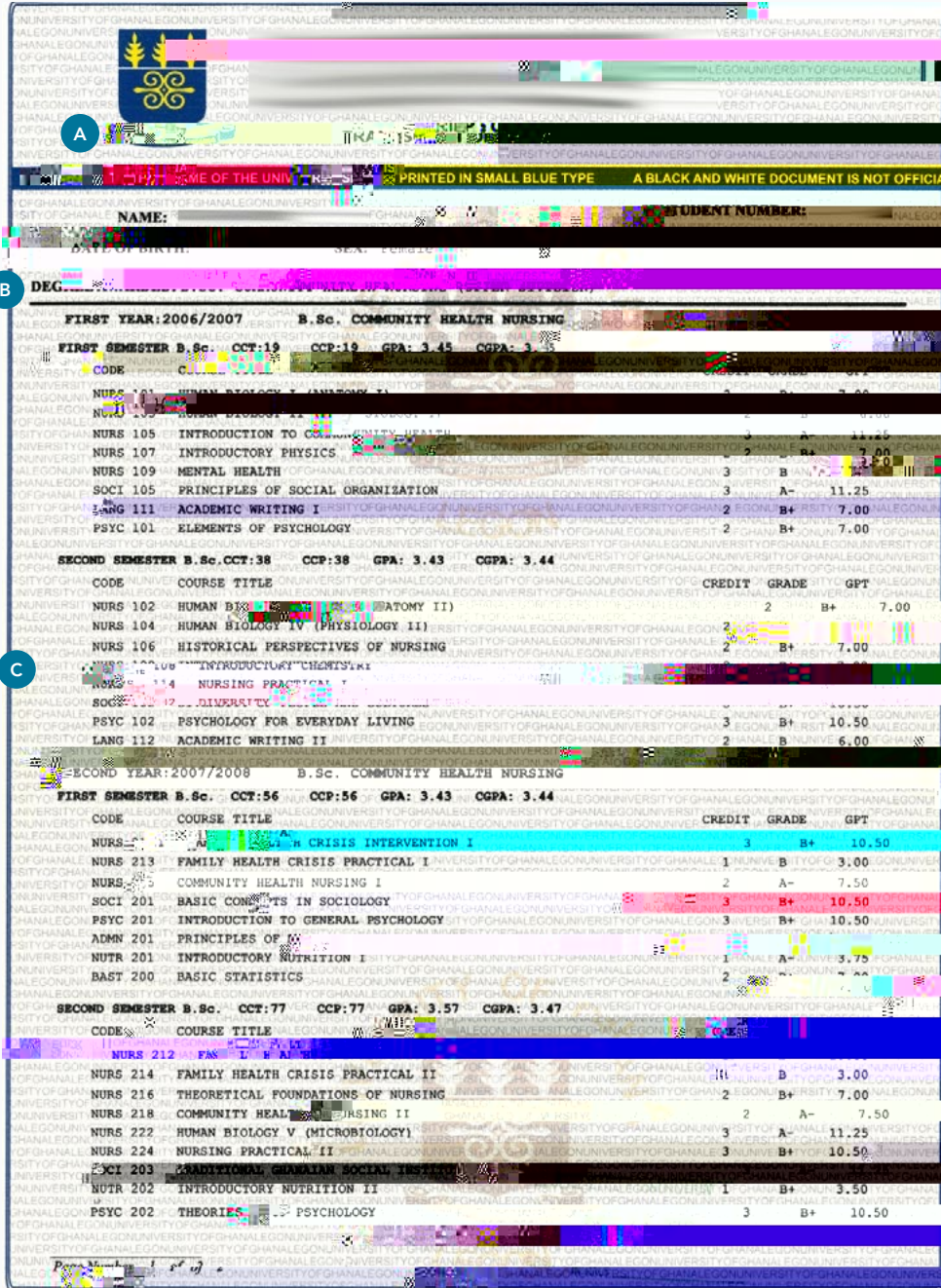


Figure 2: Confirmed fraudulent transcript for a Bachelor of Science in Community Health Nursing



- A. The seal should be golden in hue and not yellow, as it appears here.
- B. The Bachelor of Science in Community Health Nursing does not exist at this university.
- C. The transcript is printed on tinted, textured resume-type paper. Instead, the paper should be white and smooth in feel.

It is essential to bear in mind, however, that observance of any of the characteristics listed above is not an automatic indication that an applicant's credentials are fraudulent. Yet, they are possible clues and a combination of them would warrant sufficient concern. When this happens, evaluators should contact the relevant educational or nursing authorities for verification.

Is the Institution of Study Recognized?

In addition to checking if the records are valid, it is also crucial to confirm that the studies they represent are valid as well. This piece is in large part tied to the status of the school and whether it is recognized in the host country. In particular, one should check that the institution is approved and authorized to provide (nursing) education in that country and that the resulting credentials qualify holders to practice as nurses there. Depending on the country of study, the recognizing authority may be the Ministry of Education, the Nursing Council, the Ministry of Health or equivalent.

Diploma mills often cause confusion as a result of their vague accreditation status. They also confuse valid avenues of nontraditional education and alternative means of earning credit. For instance, one can earn credit by examination (e.g., CLEP), independent study, online programs and work experience/internships. While credit may be given for work experience, an entire degree cannot be. The premise of diploma mills is that they award degrees based on one's life experience, so usually no coursework is required. As such, diploma mills are also a form of fraud, as their qualifications do not represent formal academic study. Unfortunately, degree mills persist because the Internet and an easy electronic banking system have provided a way to remain anonymous and advertise to millions of people at very little cost.

Figure 3: Bachelor of Science in Nursing from Rochville University, a Diploma Mill³

³ Image of Chester, the Dog taken from "Dog Gets Online MBA" at <http://www.geteducated.com/news-releases/288-sept-23-2009-dog-gets-online-mba>

Diploma mills also further confound the issue by making use of accreditation mills, that is, claiming recognition by entities that do not have the authority to do so, unbeknownst to the public. In Figure 3, we find a Bachelor of Science in Nursing from Rochville University, whose website claims accreditation by the Board of Online Universities Accreditation (BOUA) as well as the Universal Council for Online Education Accreditation (UCOEA). However, these are not recognized accrediting bodies in any of the countries where it is reportedly located, such as Pakistan and the U. S. In particular, the BOUA and UCOEA are not approved by the Council for Higher Education Accreditation (CHEA) or the United States Department of Education.

Further research will also reveal that Rochville University awarded a degree to Chester Ludlow, a dog from Vermont. After his resume was sent in with a \$499 check, Chester received an MBA a week later, with a GPA of 3.19. Fortunately, one can consult a number of lists on diploma mills and institutions with dubious recognition. While there is no one exhaustive resource, one such listing can be found [online](#).

Gray Areas

Regrettably, there are also credentials that are not always straightforward to evaluate. This occurs when information is sparse, when there is unreliable or conflicting information⁴, and when the originating country has a limited or nonexistent regulatory process. This is found to be the case for certain nursing qualifications from Jamaica, Haiti and the Philippines. Caution is recommended when reviewing credentials in instances such as these.

The Nursing Council of Jamaica (NCJ) is the regulatory body responsible for overseeing the training and practice of nurses and enrolled assistant nurses there. The Council also administers the examinations required for registration. However, there are a number of programs in Jamaica that produce practical nurses. The training and work of practical nurses, which are separate from enrolled assistant nurses, are not regulated by the Nursing Council of Jamaica⁵.

A similar situation can also be found in Haiti. The Ministère de la Santé Publique et. de la Population (Ministry of Public Health and Population, MSPP)⁶ oversees the training and practice of nurses and assistant nurses, referred to as infirmières and infirmières auxiliaires, respectively. However, there are also a variety of programs in Haiti that produce “registered nurses” and “practical nurses” that do not operate under the oversight of the MSPP.

The Philippines, which sends a large amount of health care professionals to the U.S., also claims a substantial number of practical nursing programs. While many are registered with the Technical Education and Skills Development Authority (TESDA), the graduates are not subject to a separate licensure process under the Professional Regulation Commission, unlike the general nurses who wish to practice there. Many of these programs are designed specifically to prepare practical nurses for the U.S., touting the preparedness of their students for the NCLEX examinations. The limited oversight and regulation of these programs have raised concerns.

⁴ Examples include receiving forged letters from the Ministry of Health.

⁵ The NCJ maintains a list of recognized schools for each nursing level on its website at <http://www.nursingcouncil.org.jm/>.

⁶ The MSPP maintains a list of recognized schools, also for each nursing level, on its website at <http://www.mspp.gouv.ht/site/downloads/Liste%20Ecoles%20de%20Formation%20en%20Sante%20reconnues%20par%20le%20MSPP%2011%20Mars%202014.pdf>.

Figure 4: Practical Nursing Certificate from JLF University Allied Health College, which was prosecuted in the state of Florida in 2011

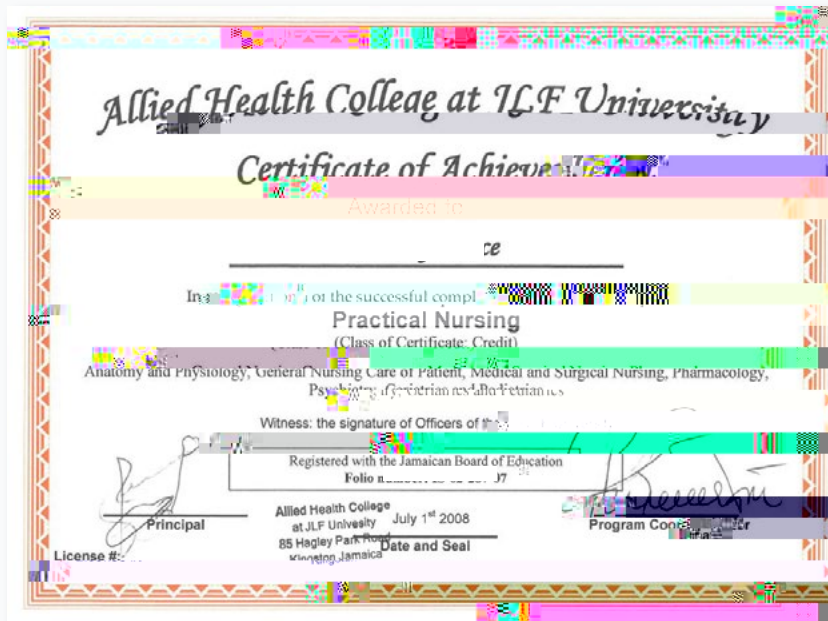


Figure 4 above shows a practical nursing certificate from Allied Health College at JLF University. JLF University, which has affiliated locations in Florida, Haiti and Jamaica, was sued by Florida Attorney General Pam Bondi for defrauding students in 2011. The following year, the university and its affiliates were required to pay \$469,000 in restitution and an additional \$67,000 in civil penalties⁷. The institution's website and the transcript for the above qualification together claim accreditation by Accrediting Commission International (ACI), the Association of Distance Learning Programs (ADLP), and the United States Distance Learning Association (USDLA). However, all three entities are accreditation mills.

Another troublesome area in fraud, of course, involves imposters and inside jobs. While these are more difficult to detect, inconsistencies again can give them away. People can take great lengths to commit fraud, such as having impersonators of courier services like DHL deliver documents supposedly sent from the institution of study. Luckily, couriers are generally charged with the same daily route. As such, evaluators can make enquiries if there is someone unfamiliar delivering a package and if the airway bill and tracking number do not quite match the standard format of the courier service.

Nursing school officials are also a target of impersonators. In 2009, IERF purportedly received nursing qualifications from Western Hills School of Nursing in Ghana. Seeking clarification regarding its program of study, the evaluators had been in email communication with the head of the school, who was using a Yahoo email account at the time. When the school continued to readjust the transcripts to suit the requirements, grave concerns were raised. With the assistance of an EducationUSA advisor⁸ and subsequently Ghana's National Accreditation Board, it was determined that the transcripts were faked by someone posing as the principal in the email communications. There are many educational institutions abroad that make use of generic, public email accounts rather than an institutional ".edu" email account. However, this episode demonstrates that caution is needed and that the email addresses, if from public accounts, should be verified, such as on a directory or school website.

7 Nash, B. et al (2012). "State AGs in the News" <http://www.stateagmonitor.com/2012/08/02/state-ags-in-the-news-46/>

8 Under the jurisdiction of the US Department of State, there are EducationUSA offices located in 170 countries around the world, assisting the students there with the admissions and enrollment process in the US

Other patterns to be mindful of are that fraudulent applications frequently come in batches from the same school and from candidates who are not native to the country of study. As an example, 12 applications were received by IERF in the Western Hills School of Nursing case and 18 were received from JLF University Allied Health College within the same time period. Additionally, most of the applicants were not originally from Ghana and Jamaica/Haiti, respectively. All these cases were subsequently withdrawn and notices were sent to the state licensing boards.

Next Steps

It is not the intention of this section to create paranoia and impractical, stringent requirements within the licensure process. However, it is hoped that it does showcase how critical it is for agencies to establish requirements that are



Appendix B

Credential Evaluation: Best Practices Worksheet

Agency Background:



Glossary

ATA:

BON:

CBC:

CGFNS:

NAFSA:

NCSBN:

Second-level or enrolled nurse:

SSA:

SSN:

USCIS:

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