

March 23, 2020
Governor Gavin Newsom
State Capitol of California
1303 10th Street, Suite 1173
Sacramento, California, 95814

Dear Governor Newsom,

The purpose of this letter is to request an Executive Order to direct the California Board of Registered Nursing to suspend two sections of Title 16 (highlighted below). In this current crisis of COVID-19 nursing students are unable to complete the required percentage of clinical hours in direct patient care due to restricted access to clinical sites and limitations for utilizing simulation as a clinical substitute. If the sections are not suspended, there will be a significant reduction to the volume of nurses entering the workforce in the next 6-8 months, exacerbating an already compromised situation.

Background

As simulation experts, the California Simulation Alliance is a virtual alliance that has been transforming health professional simulation-based education for the past 12 years. Concerns regarding the transmission of COVID-19 have led to the discontinuance of clinical rotations for nursing students across the state. Educators are striving to develop and implement innovative virtual and online learning strategies to replace the lost clinical hours while meeting learning outcomes and promoting clinical competence. Nevertheless, the majority of nursing programs will struggle to meet current regulations thus delaying the graduation of thousands of nursing students at a time when the workforce and community needs them the most.

The Board of Registered Nursing regulation (16 CCR §1426(g)(2)) requires at least 75% of a clinical course must be in direct patient care, with simulation being allowed up to 25%. The regulation also requires the Board of Registered Nursing to pre-approve direct patient care sites. This will cause delays for faculty and students in this crisis. Additionally, Board of Registered Nursing regulations for nurse practitioner students require that all 500 hours be in direct patient care (16 CCR §1484(h)(5)).

We are asking that you issue an Executive Order to direct the Board of Registered Nursing to suspend two sections of Title 16 and replace them with the following suggested language to mitigate the current challenges and allow nursing students to graduate timely and enter the workforce:

§1426(g)(2): Until December 31, 2020, all Board of Registered Nursing approved pre-licensure nursing programs may use simulation and distance learning methods for clinical experiences such as, but not limited to, telehealth without pre-approval to meet the program and student learning objectives. There is no percent limitation to these learning methods.

§1484(h)(5): Until December 31, 2020, all Board of Registered Nursing approved nurse practitioner programs may use simulation and distance learning methods for clinical experiences such as, but not limited to, telehealth without pre-approval to meet the program and student learning objectives. There is no percent limitation to these learning methods.

Our request will ensure that nursing programs and nursing faculty are immediately granted the maximum flexibility necessary to meet course objectives during this pandemic.

Respectfully,

A handwritten signature in black ink that reads "KT Waxman". The signature is written in a cursive style with a large, stylized initial "K".

KT Waxman, DNP, MBA, RN, CNL, CENP, CHSE, FSSH, FAONL, FAAN

Director and Faculty

(925) 413-1929

kt@healthimpact.org