April 22, 2020

Dear Program Directors:

The State Board of Nursing (Board) has been receiving inquiries from nursing education programs relating to the impact of the COVID-19 pandemic and the Governor’s Emergency Declarations on Pennsylvania’s certified registered nurse practitioner (CRNP) programs. Although many issues are in flux due to the unknown length of the pandemic, the following provides some responses to the inquiries.

**Clinical Hours**

The Board has been asked how Programs should accomplish their clinical hour requirements in light of the state-mandated Program suspensions and clinical site adjustments/closures. This determination should be made by the Programs using the following constructs contained in the Board’s regulations:

- A CRNP program must prepare the registered nurse (RN) to function as a nurse practitioner in a particular specialty, performing acts of medical diagnosis and prescription of medical, therapeutic or corrective measures in collaboration with a physician.
- The curriculum must be organized and developed to include the knowledge, attitudes, skills and abilities necessary for practice as a CRNP.
- The instructional strategies must be appropriate and consistent with the program’s philosophy, mission and objectives.
- CRNP courses and curriculum must be organized to continue the development of values, understandings, knowledge and skills needed in all aspects of practice as a CRNP and emphasize specialty areas.
- The CRNP student shall receive sufficient clinical experience to provide depth and breadth in a given specialty or with designated populations, geared to nurse practitioner practice. The complexity of the specialty content, as well as the need for clinical experience to enhance retention and skills, shall be considered.
- The CRNP program must provide an ongoing student evaluative process that assesses the student’s progress toward and ultimate achievement of program objectives. The student evaluative process must include documentation of faculty-supervised performance evaluation of students and utilize evaluation tools that reflect nurse practitioner National competencies in the specialty areas.

In terms of clinical hours:

- CRNP programs must provide enough clinical hours to meet National certification requirements but no less than 500 clinical hours.
- Additional hours must be provided for specialties that care for multiple age groups or for those who will practice in multiple care settings.
- The expected graduate competencies must be the key determinant of the clinical component.
- National certification organizations may have additional requirements beyond those of the Board and should be contacted for information about their requirement for supervised direct patient care clinical hours.
Because the Board was aware of a disruption to many Programs, on March 11th, it posted an announcement on eppiccNURSE and sent an email advising that if a Program determined it was necessary to alter its method of curriculum delivery or clinical hours, the Program should inform the Board of the proposed action to be taken and provide a plan to assure that students continue to attain learning objectives during the period of the emergency declaration.

The Board has been accepting written plans by email and acknowledges plans following a review to assure that students will continue to achieve their learning outcomes. The plans will be placed in the Program’s files.

If a Program’s plan changes due to the continuing emergency declaration, a revised plan, along with its rationale must be submitted.

Completion Requirements for Students Nearing Graduation

The Board has also been asked how Programs should submit Verifications of Nurse Practitioner Programs and Verifications of Advanced Pharmacology when either the Program’s seal or an original authorized signature is unable to be affixed. During the COVID-19 emergency, it is acceptable to send pdf copies of the Verifications to st-nurse@pa.gov directly from the Program’s authorized signatory’s email account without affixing the school seal. The official signature may be affixed electronically. Once the COVID-19 emergency is lifted, the Board expects that any Verifications emailed during the emergency be replaced with Verifications containing original signatures and the school seal.

National Certification Examination Test Centers

The Board has been advised that some of the Board-recognized National nurse practitioner certification examinations are unavailable because of the COVID-19 emergency. As a result, the Governor has suspended the requirement that applicants hold National certification in a Board-recognized specialty during the COVID-19 emergency. CRNPs will be required to hold National certification after the Emergency Declaration has ended. Additional information regarding applying for CRNP certification during the COVID-19 emergency is available on the Board’s website in the document entitled, “Updated Directions Related to the Suspension of Provisions of the Professional and Practical Nursing Laws and the State Board of Nursing Regulations Due to COVID-19”.

Additional Resources

Please check the following websites as they are continually being updated:

- Department of State (www.dos.pa.gov),
- Bureau of Professional and Occupational Affairs (www.dos.pa.gov/ProfessionalLicensing/Pages/Bureau-of-Professional-and-Occupational-Affairs.aspx), and
- The State Board of Nursing (www.dos.pa.gov/nurse).