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August 11, 2022

Chair Robert W. Weinman
Wisconsin Board of Nursing
Department of Safety and Professional Services
4822 Madison Yards Way
Madison, Wisconsin 53705

Dear Mr. Weinman:

Nurses make up more than half of Wisconsin's hospital and health system clinical workforce, and these more than 40,000 nurses are dependent on state licensure for their employment and to provide health care services to the Wisconsin communities they serve. Health care employers are facing double-digit and rising vacancy rates in licensed occupations like nursing and respiratory therapy. When delays in licensure occur, they are acutely felt by applicants waiting for employment and by employers working to maintain and grow health care access to meet rising demand.

Even before our August 2021 letter to Wisconsin's Department of Safety and Professional Services (DSPS) requesting that health care licensure be prioritized and expedited, WHA and DSPS have been discussing opportunities to streamline the process. The urgent and short-term improvements created by DSPS in August and since that time helped Wisconsin hospitals and health systems meet rapidly rising demands; frequent and ongoing interactions about licensure delays have also provided insight for WHA and DSPS to discuss mid- and long-term improvement opportunities to safely remove unnecessary steps in licensure processes.

DSPS Secretary-designee Dan Hereth presented an opportunity to the Board of Nursing today for a small change that will have a big impact by eliminating the administrative rule requiring the Board of Nursing to make applicants eligible to take the National Council Licensure Examination (NCLEX).¹ Wisconsin licenses more than 3,000 newly graduated nurses every year, with the bulk of these graduations occurring each May. This year, according to DSPS leadership, NCLEX approval turnaround time adds about three weeks to the process, and the three-week clock starts ticking only after busy schools have submitted the required documentation for each nurse's application. As Secretary-designee Dan Hereth and WHA have discussed, removing this requirement will take a step out of the process without jeopardizing the robustness of licensure processes. This change will also allow for parallel work by applicants, schools and DSPS. Schools and DSPS can continue processing work on the application while the new nurse schedules and completes their exam.

¹ WI Administrative Code Chapter N 2 Licensure, N2.105(5)(a); 2.11(3)(b); 2.12(3)(b)

WHA urges the Board of Nursing, DSPS, and Governor Evers to quickly move on an Emergency Rule allowing individuals applying for nurse licensure by examination to complete this examination without board approval just like other health care occupations already do. We would also suggest pursuing a similar change if there are other occupations where Board action is needed according to administrative rule, but not required by the national certifying body.

We know there is more work to be done to ensure that Wisconsin's licensure processes support the health care workforce necessary to sustain quality and access, and we are proud to support this rule change, and the important work DSPS has undertaken. We look forward to continuing our involvement in reforms that allow licensure to perform its intended function of ensuring patient and consumer safety without creating barriers to care for patients and hurdles to health care careers.

Sincerely,

/s/

Ann Zenk
Senior Vice President Workforce and Clinical Practice

cc: Governor Tony Evers
DSPS Secretary-designee Dan Hereth