

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF STATE March 2, 2022

Dear:

Alliance of Health Care Providers American Physical Therapy Association - Pennsylvania Pennsylvania Academy of Family Physicians Pennsylvania Affiliate, American College of Nurse-Midwives Pennsylvania Affiliate, American Association of Certified Midwives Pennsylvania Association of Community Health Centers Pennsylvania Association of Medical Suppliers Pennsylvania Association of Nurse Anesthetists Pennsylvania Chapter of the American Academy of Pediatrics Pennsylvania Chapter of the American College of Physicians Pennsylvania Chiropractic Association Pennsylvania Coalition for Oral Health Pennsylvania Medical Society Pennsylvania Psychological Association Pennsylvania Rural Health Association Pennsylvania State Nurses Association Pennsylvania Society of Physician Assistants Pennsylvania Society for Respiratory Care Rehabilitation and Community Providers Association Safety-Net Association of Pennsylvania The Hospital and Healthsystem Association of Pennsylvania The Urban Health Care Coalition

Thank you for your letter concerning the timely processing of licensure applications and license renewals for the more than 500,000 healthcare professionals overseen by the Department of State (DOS) and the 16 Boards that comprise our Health Licensing Division within the Bureau of Professional and Occupational Affairs (BPOA). We recognize the indispensable care and services these individuals provide and agree that the processing of all licenses must be as efficient and transparent as possible, while ensuring first and foremost that the health and safety of Pennsylvanians and the public at large is protected.

We appreciate your recognition of the hard work being done day in and day out by the staff at BPOA, as well as your acknowledgement of the various changes and improvements that we have already undertaken to improve processing. While every effort is made to fill vacancies at BPOA, the Commonwealth and the Department face many of the same hiring challenges and staffing shortages that most employers are currently grappling with - whether it be expected departures from the workforce such as those resulting from the retirement of baby boomers, or the unforeseen departures that your industries are experiencing from having spent the last two-plus years fighting a pandemic that continues to take a particularly hard toll on those in the healthcare field.

In your letter you mention being "particularly concerned as Pennsylvania moves into the renewal period for physicians and the cycles for nurse practitioners and physician assistants," and concerns regarding the potential disruption that delays will have on patient care. We are hopeful that a brief overview of the renewal process might allay those concerns.

BPOA renewals are handled as follows: with a few exceptions, the licenses issued by a particular board for a particular profession all expire on the same date. For example, the State Board of Psychology recently completed its biennial renewal. The licenses issued by that board expire on November 30 of every odd-numbered year (so, in this case, the renewal period for all licensed psychologists concluded on November 30, 2021). BPOA "goes live" with a renewal approximately 60 days prior to the expiration date (sometimes even earlier, e.g., 75 or 90 days prior). For the Psychology Board renewal, the window opened on September 25, 2021. When a renewal window opens, licensees are sent a notice from BPOA that provides instructions on what they must do to renew their license.

The renewal process itself is relatively straightforward and is completed entirely online. Licensees simply need to go into their Pennsylvania Licensing System (PALS) account and provide the information requested. If the licensee provides all of the required information, PALS will self-generate the approval and issue the renewal.

We are pleased to report that there are currently no renewal backlogs or processing delays. In fact, for most of February 2022, none of the 29 boards and commissions were even in an active renewal period. On February 26, 2022, the renewal windows opened (and notices were sent) for licensees under the State Board of Barber Examiners, the Navigation Commission, and the State Board of Nursing's "April-of-even-years" cohort of RNs, CRNPs, Clinical Nurse Specialists and Prescriptive Authority authorizations.

You expressed particular concerns over renewal delays for physicians, nurse practitioners, and physician assistants. We feel it is important to provide specific information for those professions and the boards they fall under:

## • Physicians and Physician Assistants

Licenses issued by the State Board of Medicine expire on December 31 of each even-numbered year.\* This means that all licensees who currently hold an active license from the Board of Medicine – including physicians (MDs) and physician assistants - are not due for renewal until December 31, 2022. Their renewal window will open sometime around October 31, 2022. (\*Graduate Medical Trainees are the lone exception - their licenses are issued for a maximum of one year, and most but not all of them have a June 30 expiration date)

Similarly, licenses issued by the State Board of Osteopathic Medicine expire on either October 31 or December 31 of each even-numbered year. Licensees who currently hold an active osteopathic physician (DO), physician assistant or acupuncturist license from the Board of Osteopathic Medicine are not due for renewal until October 31, 2022. Their renewal window will open sometime around August 31, 2022. (Licenses for all osteopathic respiratory therapists, perfusionists, athletic trainers and genetic counselors expire on December 31 of each even-numbered year; their next renewal window will open around October 31, 2022 and close on December 31, 2022).

## Nurse Practitioners

Due to the sheer number of licensees under the State Board of Nursing, renewals for RNs, CRNPs, Clinical Nurse Specialists, and CRNP Prescriptive Authority authorizations are spread across four separate cohorts, in a cycle that repeats each biennium (April 30 of even years, October 31 of even years, April 30 of odd years, and October 31 of odd years). (The remaining license types under the State Board of Nursing – Practical Nurses and Dietitian-Nutritionists – expire on June 30 (LPNs) and September 30 (LDNs) of each even-numbered year.) So the cohort of Nurse Board licensees whose licenses are set to expire on April 30, 2022, are about to enter their renewal period. Notice will be going out shortly to them as soon as BPOA goes "live" with their renewal. We have already gone through our standard internal PALS testing to ensure that the renewal will proceed in normal fashion, and do not expect any unusual delays or backlogs. The earlier that licensees can take care of renewing once their renewal window opens, the better. Ensuring that licensees provide BPOA with all of the required information is also key.

Another option for some candidates is a Temporary Practice Permit (TPP.) For candidates whose pathway to Pennsylvania licensure requires them to take the licensure exam – including some registered and practical nurses licensed in other states, as well as graduates of nursing education programs – TPPs allow them to work while waiting to take the exam. The State Board of Nursing also issues TPPs to out-of-state licensees whose pathway to Pennsylvania licensure does <u>not</u> require examination.

Lastly, PALS is nearing end-of-life and will need to be replaced. To that end, the Department initiated the procurement process in Fall of 2021. The objective is a modernized, reliable, user-friendly system that reflects the needs of all stakeholders — healthcare professionals, healthcare systems, and the BPOA workforce that supports and maintains the licensing process. The Governor's 2022-2023 budget request includes an initial \$5 million for PALS replacement procurement. The reason is as you stated in your letter, to ensure Pennsylvanians have the high-quality health care they need and deserve.

Thank you, again, for your letter. Your input is valued and timely. Please do not hesitate to contact me with any additional concerns and insights.

Sincerely,

Leigh M. Chapman Secretary of State

CC: The Honorable Tom Wolf, Governor

The Hon. David Hickernell, Chair, House Professional Licensure Committee

The Hon. Frank Burns, Minority Chair, House Professional Licensure Committee

The Hon. Robert Tomlinson, Chair, Senate Consumer Protection & Professional Licensure Committee

The Hon. Lisa Boscola, Minority Chair, Senate Consumer Protection & Professional Licensure Committee