



March 25, 2020

Secretary-Designee Dawn B. Crim  
4822 Madison Yards Way  
Madison, WI, 53705-9100

RE: Granting Wisconsin Board of Nursing authority to waive Nursing Administrative Code in response to the COVID-19 Health Emergency

Dear Secretary-Designee Crim,

On behalf of the members of the Wisconsin Nurses Association, we thank you for your leadership during the COVID-19 pandemic. As you know, the Wisconsin Nurses Association represents Wisconsin's largest healthcare workforce, the 90,000 nurses on the front lines during this public health crisis. To meet the urgent needs of patients and nurses, we respectfully request you apply your administrative authority to grant the Wisconsin Board of Nursing's request to waive the Nursing Administrative Code adjusting certain state-level restrictions, specifically: the Advance Practice Registered Nurse scope of practice and standards for nursing student simulation to meet clinical requirements.

#### Advance Practice Registered Nurses

Advance Practice Registered Nurses (APRN) evaluate patients, make diagnoses, order, perform, and interpret diagnostic tests, as well as initiate and manage treatments – including prescribing medications and non-pharmacologic treatments. APRNs also coordinate care, provide patient counseling, and educate patients, families, and communities. As evidence to the independent scope of practice landscape, APRNs have the authority to practice to the full extent of their education and board certification in 22 states, the District of Columbia, two U.S. territories, the Veterans Hospital Administration and Indian Health Service. During this public health emergency and following, Wisconsin has the opportunity to join this group of jurisdictions and allow APRNs to treat and care for patients using their full scope of practice. This could be achieved with a waiver of Chapter N8.10(2) and N8.10.(7).

#### Nursing Student Education and Simulation

Substantial evidence supports that simulation learning can be effectively substituted for traditional clinical experience in all pre-licensure core nursing courses. Under the current Administrative Code, Chapter N 1, Approvals for Schools of Nursing, Section 1.08 Standards (5m), simulation may not be utilized for more than 50% of the time designated for meeting clinical learning requirements.

During the COVID-19 crisis, most all academic learning environments are adjusting to distance platforms and alternative methods. The Wisconsin Nurses Association supports the Board of Nursing's request to temporarily waive the Administrative Code providing an expansion of the simulation learning requirements for nursing student education. This type of waiver will ensure that critically needed new members of the nurse workforce will not be delayed in meeting clinical requirements to graduate and care for patients during the COVID-19 pandemic crisis.

#### Increase the Supply of Registered Nurses

We also ask that the Board of Nursing have the authority to waive Sections of N.2, Renewal of License. A waiver would allow for nurses who are not currently licensed have the ability renew in an expedited manner. There are nurses who are interested in returning to the workforce to support COVID-19 efforts. Administrative Code N 2.40(3)(d)2 decreases entry time as it requires completion of a refresher course.

We thank you in advance for consideration of our request. Please feel free to contact Gina Dennik-Champion at 608-228-3300 if you have any questions. We look forward to hearing from you.

Sincerely,



Pamela Macari Sanberg, MN, RN, NEA-BC  
WNA President



Gina Dennik-Champion, MSN, RN, MSHA  
WNA Executive Director