



March 30, 2020

The Honorable Governor Jay Inslee
Office of the Governor
PO Box 40002
Olympia, WA 98504-002

John Wiseman, Dr.PH, MPH, Secretary of Health
Washington State Department of Health
101 Israel Road SE
Tumwater, WA 98501

Dear Governor Inslee and Secretary Wiesman:

On behalf of Washington's public and not-for-profit, private two- and four-year colleges and universities, we write in response to (1) directives regarding COVID-19 found in Executive Order 20-32 addressing Department of Health healthcare worker licensing; and (2) guidance published by the Nursing Commission on March 13, March 18, and March 24, 2020, respectively.¹ We applaud these efforts to identify areas of flexibility as we all strive to provide a continued supply of nursing and allied healthcare workforce while ensuring the safety of students, trainees, and the public. This letter outlines seven recommendations our colleges and universities temporarily need to ensure the supply of nurses in the coming weeks and months.

Our intent is to ensure the continued impact of our collective educational institutions' substantial contributions to the healthcare workforce during this crisis. Last year alone Washington's public and independent higher education nursing and nursing assistant programs produced 3,803 Registered Nurses; 213 Practical Nurses; and 1,139 Nursing Assistant program completers.

To that end, this letter outlines immediate action the Nursing Commission should take to increase our institutions' ability to meet the urgent workforce demand brought about by the COVID 19 crisis. This letter is accompanied by the white paper entitled *Innovations in Nursing Education in Response to the COVID-19 Pandemic* that sets forth evidence for the actions we are requesting.

¹ Guidance Letters issued electronically by NCQAC: "Final D-D COVID-19 3-13-2020.pdf", "Final D-D 3-18-20 3pm.pdf", "COVID-19 Communication to NA Training Program Directors—March 18, 2020.pdf", and "Dear Deans and Directors Final 3-2-20.pdf".

We strongly implore the Commission to temporarily allow discretion to nursing and nursing assistant programs to adopt the following flexibility measures without further review by the Commission, while programs retain all related documentation regarding educational program adjustments:

- **Increase simulation hours in lieu of direct-care clinicals to permit 50% use of simulation (WAC 246-840-534).** Allow the proportion of simulation to be calculated over the entire curriculum rather than by course. This will allow programs to flex when students can return to in-person clinical agencies—likely not before the end of this academic year.
- **Permit virtual simulation on an equivalent basis to lab-based simulations.** Virtual simulation should be permitted in programs that can document standards for pre-briefing, debriefing, and assessment of learning outcomes, per the standards set forth in WAC 246-840-534. The WAC does not distinguish in-person vs. virtual simulation but the practice of the Commission has been to consider in-person only.
- **Raise the ratio of simulation to clinical time to 1:2 (one hour of simulation equating to two hours of clinical time).** Accept one hour of virtual simulated clinical learning using International Nursing Association for Clinical Simulation (INACSL) standards in place of two hours of clinical placement time. INACSL standards are published guidelines for pre- and post-briefing surrounding simulated learning and other simulation best practices.
- **Eliminate requirements for minimum number of clinical hours for prelicensure programs** leaving evaluation of student achievement of program outcomes up to the nursing program during this crisis.
- **Enable synchronous and asynchronous online teaching of classroom theory/didactic content for all nursing assistant and nursing programs.** The temporary expedited process for notifying Nursing Program Approval Panel (NPAP) of this change, while appreciated, does not fully recognize the fact that all programs must start Spring Quarter 2020 or continue the Spring semester via remote or distance instruction, and faculty are working tirelessly over spring break to effectuate this conversion. The alternative is the suspension of instruction.
- **Enable electronic transcripts for cohorts of students already enrolled in nursing assistant and nursing programs.** For students completing shorter, open-enrollment programs that graduate students quarterly, colleges need a temporary solution for notifying the Nursing Commission of new graduates. Using an electronic format beyond the currently approved methods will expedite the process.
- **Enable front-loading classroom theory/didactic content for all programs, and safety/emergency training for nursing assistant programs, in order to expedite student progress to degree, NA-R, and/or other expedited pathways such as nurse technician.** So that instruction can proceed Spring Quarter 2020, programs must be able to front-load this type of content without further, individualized review.

While we applaud the Executive Order's and Nursing Commission's efforts to promote flexibility while maintaining programmatic rigor and preserving public safety, we believe these recommendations are essential to meeting Washington's immediate needs for new health care workers amid this public health crisis. We urge that an amended proclamation address these remaining barriers.

Thank you for your consideration.

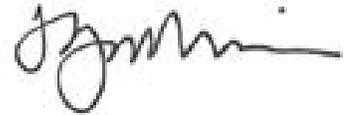
Sincerely,



Paul Francis, Executive Director
Council of Presidents



Terri Standish-Kuon, PhD
President & CEO
Independent Colleges of
Washington



Jan Yoshiwara, Executive Director
State Board for Community &
Technical Colleges

Attachment:

Innovations in Nursing Education in Response to the COVID-19 Pandemic

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