



California Community Colleges



April 3, 2020

Ms. Kimberly Kirchmeyer
California Department of Consumer Affairs
1625 North Market Blvd., Suite N 112
Sacramento, California 95834

Dear Ms. Kirchmeyer:

The impact of the COVID-19 pandemic on the state's healthcare system and its effect on the California Community Colleges (CCC), the California State University (CSU) and Association of Independent California Colleges and Universities (AICCU) nursing programs – as well as, privately funded nursing programs – has reached a critical point. This issue is affecting all segments of higher education at a time when the state is in dire need of professionals in health and nursing. Emergency exemptions from the California Board of Registered Nursing (CBRN) are needed because many health care facilities are excluding nursing students from clinical rotations due to safety concerns.

As you know, our collective campuses statewide have responded to the crisis by transitioning to virtual instruction modalities. However, the clinical coursework placements of current nursing students at outside healthcare facilities remain significantly impacted. The severity of this situation has been exacerbated by the restrictive regulations imposed by the CBRN on the amount of clinical simulations that can be utilized for a student's clinical experience.

We need an emergency solution to continue building capacity for future healthcare professionals. Over 10,000 students across CCC, the CSU, and private non-profit colleges and universities are at risk of not completing their degree. Most affected students are in the last semester of their programs. Beyond increasing the state's capacity of health care professionals, enabling the students' completion allows them to be employable in high-demand fields as we enter a recession. Without a solution that responds to this immediate crisis and allows the students to graduate on time, California could face a serious nursing shortage in the midst of a public health crisis.

With our campuses facing full closure of clinical placements, and more expected to follow, nursing programs require a feasible and simplified plan to proceed during these exigent times.

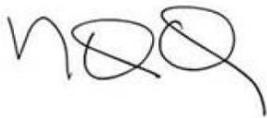
Therefore, we seek your assistance in working with the CBRN to allow nursing education to continue to support their students in coursework completion to maintain the state's nursing workforce. We request that the CBRN be directed to allow all nursing programs to have a one-time curriculum change for all clinical lab courses during the spring 2020 term. This would permit CSU programs to initiate virtual simulation activities for up to 50 percent of instructional time, and clinical competency testing by faculty to assure that students meet the

clinical laboratory requirements. This plan of action is consistent with statements issued by the American Association of Colleges of Nursing and the Commission on Collegiate Nursing Education – the national nursing accreditation organization by which all programs are approved.

The request is for CBRN to provide emergency conditions exemptions to the requirement for 75 percent of clinical hours to be in direct patient care. The proposal is consistent with temporary and emergency guidelines issued by the Department of Education to accrediting bodies, including Accreditation Commission for Education in Nursing (ACEN). Flexibility in teaching modalities, including the use of simulation, is well-established in national studies as a proven alternative option to direct patient care. Our proposed emergency waiver does not reduce the quality of nursing students' education, as nursing faculty are well prepared to adapt the curriculum to meet program objectives and provide quality education to students in preparation for their profession.

We need this emergency solution for students to enter the healthcare workforce and support the frontline nurses and other allied health workers. United with the state of California and its citizens in this public health crisis, and to assure the health and safety of all, we respectfully submit this request.

Sincerely,



Eloy Ortiz Oakley
Chancellor
California Community
Colleges



Timothy White
Chancellor
California State University



Kristen Soares
President
Association of Independent
California Colleges and
Universities