



CALIFORNIA ASSOCIATION
FOR NURSE PRACTITIONERS

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July 7, 2021

Nurse Practitioner Advisory Committee
Samantha Gables Farr, MSN, FNP-C, CCRN, RNFA, Chair
c/o Board of Registered Nursing
PO Box 944210
Sacramento, CA 94244-2100

Dear Chairwoman Farr:

California Association for Nurse Practitioners (CANP) is the unifying voice and networking forum for nurse practitioners in California, providing expert guidance and advancing the nurse practitioner profession, now at over 24,000 statewide. CANP respectfully requests that the Nurse Practitioner Advisory Committee (NPAC) include the following recommendations to the BRN with regards to implementation of AB 890.

The enactment of AB 890 has created two categories of nurse practitioners (NPs) to function independently within a defined scope of practice without standardized procedures. For clarity in our comments below, 103 NPs are so named in reference to the Business and Professions Code (BPC) Section 2837.103. 103 NPs are eligible to practice pursuant to a defined scope of practice without standardized procedures who 1) work in one of the settings below in which one or more physicians practice, and 2) satisfy requirements clearly delineated in the bill.

The 104 NPs are so named in reference to the Business and Professions Code (BPC) Section 2837.104. 104 NPs are eligible to practice independently pursuant to a defined scope of practice without standardized procedures in settings outside those listed in BPC Section 2837.103(a)(2)(A)-(F) if they meet specific criteria set forth in the bill.

CANP makes the following comments and recommendations:

1. AB 890 has a clearly defined scope of practice for NPs working in California. The policy for nurse practitioners practicing without physician supervision has been determined by the Legislature and has been signed by the Governor. The law went into effect January 1, 2021. We encourage the BRN to expedite the required actions as defined by AB 890 to improve the much-needed access to care to nurse practitioner services given that was the intention of AB 890.
2. We request that the BRN begin the regulation promulgation process for the transition-to-practice immediately by drafting language that includes the following elements:
 - Clearly state that the transition to practice is intended for new graduates. Since the bill was effective as of January 1, 2021, the regulations should specify that any nurse practitioner who graduated from accredited NP programs prior to January 1, 2018 should be deemed to have met the transition-to-practice requirement. Nurse practitioners who received their nurse practitioner certificate from the BRN on or after January 1, 2018 need to have three years or 4,600 hours of mentored practice by a physician and surgeon or nurse practitioner who has completed their transition-to-practice.
 - The transition-to-practice should only include the elements that are defined by Business & Professions Code Section 2837.101(c). No additional requirements should be included in the

transition-to-practice as the elements defined in this section of the statute are sufficient for a comprehensive transition-to-practice.

- Managing a panel of patients, working in a complex health care setting, interpersonal communication, interpersonal collaboration and team-based care, professionalism, and business management of a practice.
 - The transition-to-practice should be easily verifiable through an attestation form that is standardized.
3. Once 103 NPs complete their transition-to-practice, there should be no additional application or specific recognition by the BRN. The transition-to-practice attestation form should not be required to be submitted to the BRN for 103 NPs to practice.
4. For 104 NPs, there are two recommendations from CANP:
- First, the standardized transition-to-practice form can be included in the application for 104 NP recognition by the BRN pursuant to Business and Professions Code Section 2837.104(b).
 - Second, pursuant to Business and Professions Code Section 2837.104(b)(1)(C), we request that the BRN reduce the number of years an NP with a Doctor of Nursing Practice (DNP) degree from 3 years to 1 year. The national standards from the American Association of Colleges of Nursing Essentials for DNP Education align with the spirit of AB 890 and provide evidence that the reduction of the number of years of practicing in good standing from 3 years to 1 year.

We appreciate the opportunity to provide input into the especially important work that the Board and the NPAC are doing to effectively and efficiently implement AB 890 and expand access to care throughout California.

Respectfully yours,



Patti Gurney, MSN, NP-BC
President

cc: Assemblymember Jim Wood
Richard Figueroa, Deputy Cabinet Secretary for Health
Office of Governor Gavin Newsom
Board Members, Board of Registered Nursing
Loretta Melby, Executive Officer, Board of Registered Nursing