

Nursing Care Quality Assurance Commission

Opportunities are Present to Support Efforts by the Commission to Speed Licensing

Report 1032536

May 22, 2023



TAP INTERNATIONAL, INC.
TRAINING ANALYTICS PERFORMANCE



TRAINING | ANALYTICS | PERFORMANCE
333 University Avenue, Suite 200
Sacramento, CA 95825
www.tapinternational.org

Date: May 22, 2023
Memorandum For: Paula Meyer, Executive Director, NCQAC
From: TAP International, Inc.
Subject: Final Report

Attached is our updated draft report, *Opportunities are Present to Support Efforts by the Commission to Speed Licensing*. Washington State's need for more nurses has focused attention on how long it takes to obtain a nursing license from the Nursing Care Quality Assurance Commission (NCQAC), particularly when the nurse already holds a license issued by another state. The Washington State Legislature requested this audit to determine: (1) How long does NCQAC take to process permanent licenses for out-of-state applicants? (2) What factors, if any, contribute to possible delays in the out-of-state licensing process? and (3) What could the NCQAC do to improve licensing processes for out-of-state applicants?

This report describes:

- In 2021, the NCQAC took an average of ten weeks to complete the entire licensing process from receipt of the application to the issuance date of the license.
- Six key factors can contribute to lengthier processing times for licensing.
- Other states' practices can offer viable options for the NCQAC to consider in its efforts to ensure quality nursing care.

The nine recommendations included in this audit report will help NCQAC maintain or improve its processing times as the volume of applications grows. Appendix D of this report contains the management's response to these recommendations.

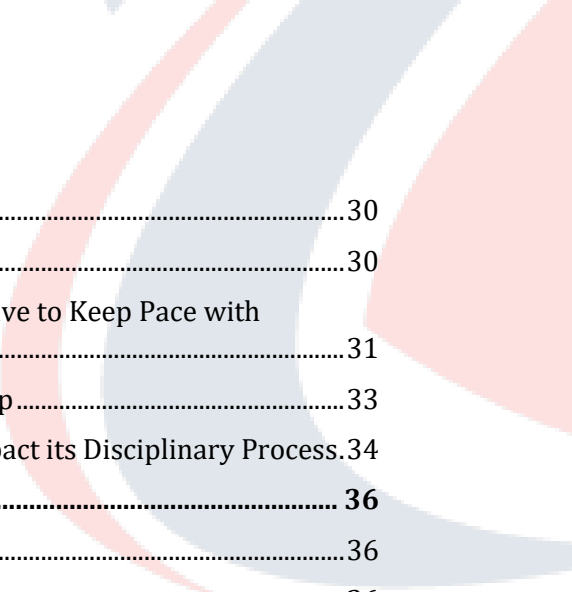
Sincerely,

TAP International, Inc.

TAP International, Inc.

Contents

RESULTS IN BRIEF	4
Why This Study is Important.....	5
How This Study Was Conducted	5
What The Study Found.....	5
What the Study Concludes.....	6
What the Study Recommends	7
INTRODUCTION.....	9
What are the Responsibilities of NCQAC?	10
How Many Licensing Applications Are Received by NCQAC?	12
Audit Objectives	13
Scope.....	14
Methods Used to Address the Audit Objectives	14
KEY RESULTS.....	15
NCQAC REQUIRES ABOUT 10 WEEKS TO PROCESS A PERMANENT NURSING LICENSE FOR OUT-OF-STATE APPLICANTS	16
Section Highlights.....	16
NCQAC's Full Licensing Process Returned to Pre-COVID-19 Pandemic Average Turnaround Times for Out-of-State Applications.....	17
Out-of-State Applications Take Longer to Process Than In-State Applications Across Most License Types.....	18
NCQAC Met its Seven-Day Goal for Final Processing of Most Applications.....	20
Other States Use Alternate Methods for Measuring Timeliness	22
NCQAC Accomplished Faster Processing for Renewals.....	22
PRIMARY FACTORS CONTRIBUTING TO LONGER PROCESSING OF OUT-OF-STATE APPLICATIONS.....	23
Section Highlights.....	23
Required Criminal Background Checks.....	23
Issuance of Deficiency Letters.....	24
Course Curriculum Checks.....	25
Current Licensing Model Design	26
Use of Outdated Technology	27
NCQAC's Staffing Strategy.....	28
OTHER STATES OFFER ALTERNATIVE PRACTICES TO DEVELOP SCALABLE LICENSING PROCESSING.....	30



Section Highlights.....	30
Use of Automation to Reduce Dependency on Manual Processing.....	30
Membership in the Nurse Licensing Compact Offers Another Alternative to Keep Pace with Application Growth.....	31
Potential Impact on NCQAC’s Licensing Process from NLC Membership	33
Streamlining of NCQAC’s Licensing Process Should Not Adversely Impact its Disciplinary Process.....	34
OTHER ISSUES IMPACTING NURSE LICENSING.....	36
Section Highlights.....	36
Outdated Regulatory Licensing Requirements	36
Out-of-State Clinical Experience Requirement	36
Educational Attestation Requirement	37
Procedural Gap in NCQAC Determining Which Background Check an Applicant Receives	37
NCQAC’s Reports Could Provide Greater Transparency of its Licensing Timeliness.....	38
APPENDICES	39
APPENDIX A: LICENSING PERFORMANCE	40
APPENDIX B: METHODOLOGY.....	46
APPENDIX C: COST ESTIMATE TO IMPLEMENT RECOMMENDATIONS.....	51
APPENDIX D: AGENCY COMMENTS AND EVALUATION.....	57
APPENDIX E: AGENCY RESPONSE.....	58
APPENDIX F: CONTACTS AND ACKNOWLEDGEMENTS	64



RESULTS IN BRIEF

RESULTS IN BRIEF

Why This Study is Important

Current and future healthcare trends include the expanding use of telemedicine, licensing nurses to practice in several states simultaneously, a rise in multistate healthcare organizations, and ongoing public health issues (like COVID-19). These trends create a demand for more nursing professionals and emphasize the state's need for a licensing process that can keep up with the associated growth in applications.

The State of Washington's Nursing Care Quality Assurance Commission (NCQAC) received over 59,000 applications for licenses to practice in Washington State between calendar year 2019 and 2021, representing an average increase of almost 4,000 applications per year. On average, about 66 percent of all licensing applications came from out-of-state or overseas applicants. While membership in the Nurse Licensure Compact (NLC) will eventually allow a nurse holding a multistate license issued by another NLC member state to practice in Washington without obtaining another nursing license, the NCQAC will continue to process applications to practice in Washington State from out-of-state nurses who are licensed by states that are not members of the NLC or do not hold an active nurse license.

How This Study Was Conducted

TAP International implemented a mixed-method approach to determine: (1) How long does NCQAC take to process permanent licenses for out-of-state applicants? (2) What factors, if any, contribute to possible delays in the out-of-state licensing process? and (3) What could the NCQAC do to improve licensing processes for out-of-state applicants? Methods relied upon statistical analysis of licensing applications, a comparative review of six other states, and 35 interviews conducted with NCQAC and Department of Health (DOH) management and staff, officials from six other states, nursing school programs in Washington State, and six national and state-based professional associations.

What The Study Found

In 2021, NCQAC issued permanent licenses to out-of-state applicants in approximately ten weeks (71 days), returning to 2019 pre-pandemic processing times after adding new staff and moving to a paperless review process.¹

Multiple factors influence the timeliness of NCQAC's licensing process. These factors include:

- Waiting for the required FBI criminal background check results,
- Issuing letters to nearly all applicants requesting additional information,
- Verifying course curriculum,

¹ Applicants can enter the workforce prior to the issuance of a permanent license if NCQAC issued a temporary practice permit.

- Depending on an outdated information system that requires an extensive level of manual processing,
- NCQAC's current licensing model design that places the burden on NCQAC versus the applicant to assemble a complete application,
- Absence of using other available technologies,
- The staffing strategy administered by NCQAC to address peak application volume.

Processing delays for out-of-state licenses ranged from one to 950 days. Other states offer alternative practices to improve licensing timeliness, for instance, using specialized software to extract and populate application information. Tools like these would be needed until the DOH completes a new information system. When issuing licenses to practice only in Washington State, NCQAC can streamline its process for faster issuance of licenses without an adverse impact on its disciplinary process.

What the Study Concludes

Obtaining a license to practice is a prerequisite for employment as a nurse in Washington State. The licensing process requires NCQAC to verify and validate that the applicant complies with Washington State's requirements and soon the Nurse Licensure Compact requirements for multistate licenses, to ensure competency and consistent standards of practice among nursing professionals. NCQAC faces several challenges in implementing its nurse-licensing program - some outside of its control and unaffected by joining the Nurse Licensure Compact - to ensure the timely issuance of licenses. These challenges include:

- Depending on the timely actions of other agencies to submit licensing related information.
- NCQAC's reliance on a legacy information system for processing applications that lacks the functionality needed for today's technological and online operating environment.
- NCQAC's approach to licensing, including a high level of fragmentation, makes the process susceptible to bottlenecks.

NCQAC's initial performance in response to the COVID-19 pandemic, during which the volume of applications and the time required for NCQAC to process an application both increased, demonstrated the need for a better and more agile licensing process. NCQAC is transforming its licensing process by supporting the DOH's development of a new licensing system. Washington's recent membership in the Nurse Licensure Compact, as well as incorporating alternative processing strategies, and increasing the use of automation will help NCQAC address expected future licensing application growth as telemedicine expands. These changes will also help meet customer expectations of timely licensing without having an adverse impact on NCQAC's disciplinary process.

What the Study Recommends


This report contains nine recommendations for the Executive Director of NCQAC, to speed licensing and to keep pace with application growth. The estimated cost of implementing each recommendation ranges from \$12,200 to \$83,060 and offers key potential outcomes, for instance, mitigating the need to continuously hire staff to keep pace with application demand. See Appendix C for additional cost detail. NCQAC management noted that implementing some recommendations would require the Commission to change the Washington Administrative Code (WAC) in coordination with the DOH, or for the Commission to ask the Washington State Legislature to change state law.

To update existing licensing requirements and promote the State's intent to protect public safety, NCQAC should work, when necessary, with the Washington State Legislature to:

1. Improve the process for collection of FBI background checks with the Health Systems Quality Assurance (HSQA) agency for licenses by endorsement and multistate licenses. For applicants seeking a license to work only in Washington State, allow NCQAC greater flexibility, under RCW 18,130.064, in the collection of criminal background checks, such as allowing background check exemptions if the applicant can demonstrate a recently completed criminal background check.
2. Eliminate the requirement for transcripts from NCQAC-approved nationally accredited nursing schools located in Washington State when the nursing school also provides lists of its graduates to NCQAC and allow NCQAC the discretion to request transcripts when needed.
3. Update the license application to collect the applicant's state of residency, physical address, and mailing address.
4. Update the WAC to allow out-of-state applicants from non-traditional nursing schools to be eligible for licensure upon completing 1,000 hours of clinical experience within Washington State.

To provide for better performance monitoring:

5. Establish and compute a measure(s) that provides for other assessments of licensing timeliness and performance. Options to consider include:
 - a. Establish goals and compute measures for overall and specific timeliness across applications measuring the actual application processing time, including out-of-state applications, and applications for multistate license from application receipt to license issuance.
 - b. Establish goals and compute measures capturing the application process to provide quantitative data on timeliness or delays, which NCQAC does and does not control, to pinpoint areas for improvement and increased timeliness. These measures should individually capture the timeliness of the intake, background, and educational review processes.

- 
- c. Develop and administer a customer satisfaction survey to gauge customer experiences with licensing timeliness.

To hasten the licensing process until the new licensing information system is fully implemented:

- 6. Purchase and implement automated technologies like artificial intelligence bots to scan and extract relevant application information versus manually entering licensing applications into ILRS.
- 7. For licenses to work only in Washington State, continue to issue Temporary Practice Permits (TPPs) for applicants, pending receipt of results of federal background checks.

To create a more scalable licensing process:

- 8. Modify the licensing process to minimize the number of touches by different staff by adopting an alternative staffing strategy, which includes expanding the areas that individual staff can review.
- 9. As part of the implementation of the Nurse Licensure Compact, assess alternative strategies, such as assignments of staff to process specific types of licensing applications versus assigning staff based on exam, endorsement, or international applications.



INTRODUCTION

INTRODUCTION

What are the Responsibilities of NCQAC?

State law (RCW 18.79.010) established Washington State's Board of Nursing as the Nursing Care Quality Assurance Commission (NCQAC), an independent entity within the Department of Health, with authority to adopt and implement its own rules and standards for educating, licensing, and disciplining licensed practical nurses, registered nurses, advanced registered nurse practitioners, and nursing technicians who practice in Washington State.

NCQAC's key responsibilities are to:

- Define the rules that constitute specialized and advanced levels of nursing practice.
- Approve curricula and establish criteria for minimum standards for schools preparing persons for licensing, including registered nurses, advanced registered nurse practitioners, and licensed practical nurses.
- Approve schools of nursing that meet the requirements.
- Approve the establishment of basic nursing education programs.
- Establish criteria for proof of reasonable knowledge and skill as a basis for safe practice after three years inactivity or lapsed status.
- Establish criteria for licensing by endorsement.
- Determine examination requirements for applicants for licensing as registered nurses, advanced registered nurse practitioners, and licensed practical nurses.

Figure 1: Composition of NCQAC Commission members



All members must be citizens of the United States and residents of Washington State. Nursing members must have been licensed to practice nursing in Washington with at least three years of experience. Public members may not: (a) be a member of any other healthcare licensing board or commission; (b) have a fiduciary obligation to a facility rendering health care services; or (c) have a financial interest in the rendering of health services.

Source: TAP International analysis of NCQAC governance documents.

How does NCQAC Process Licensing Applications?

NCQAC processes licensing of four key types of application that include:

- Licensed Practical Nurse (LPN);
- Registered Nurse (RN);
- Advanced Registered Nurse Practitioner (ARNP);
- Nursing Technician (NTEC).

NCQAC processes applications for recent nursing school graduates (an exam application) and nursing professionals who have prior experience and are licensed in other states (an endorsement application), as shown in **Figure 2**. Each license type is subject to meeting requirements established in the Revised Code of Washington (RCW) or the WAC applicable to education, experience, and/or employment before approving an application for licensing.

To determine eligibility for licensing, NCQAC implements key activities in reviewing applications regardless of type, as shown in **Figure 3**. While most licensing applications are submitted online, in some situations, a paper application submitted by mail is required, these situations include: (1) a prior licensing application that was submitted and closed as deficient; (2) if the applicant does not have enough information in the public record to verify their identity; and (3) if the applicant is reactivating a previous Washington State license.

Figure 2: Types of NCQAC License Applications*

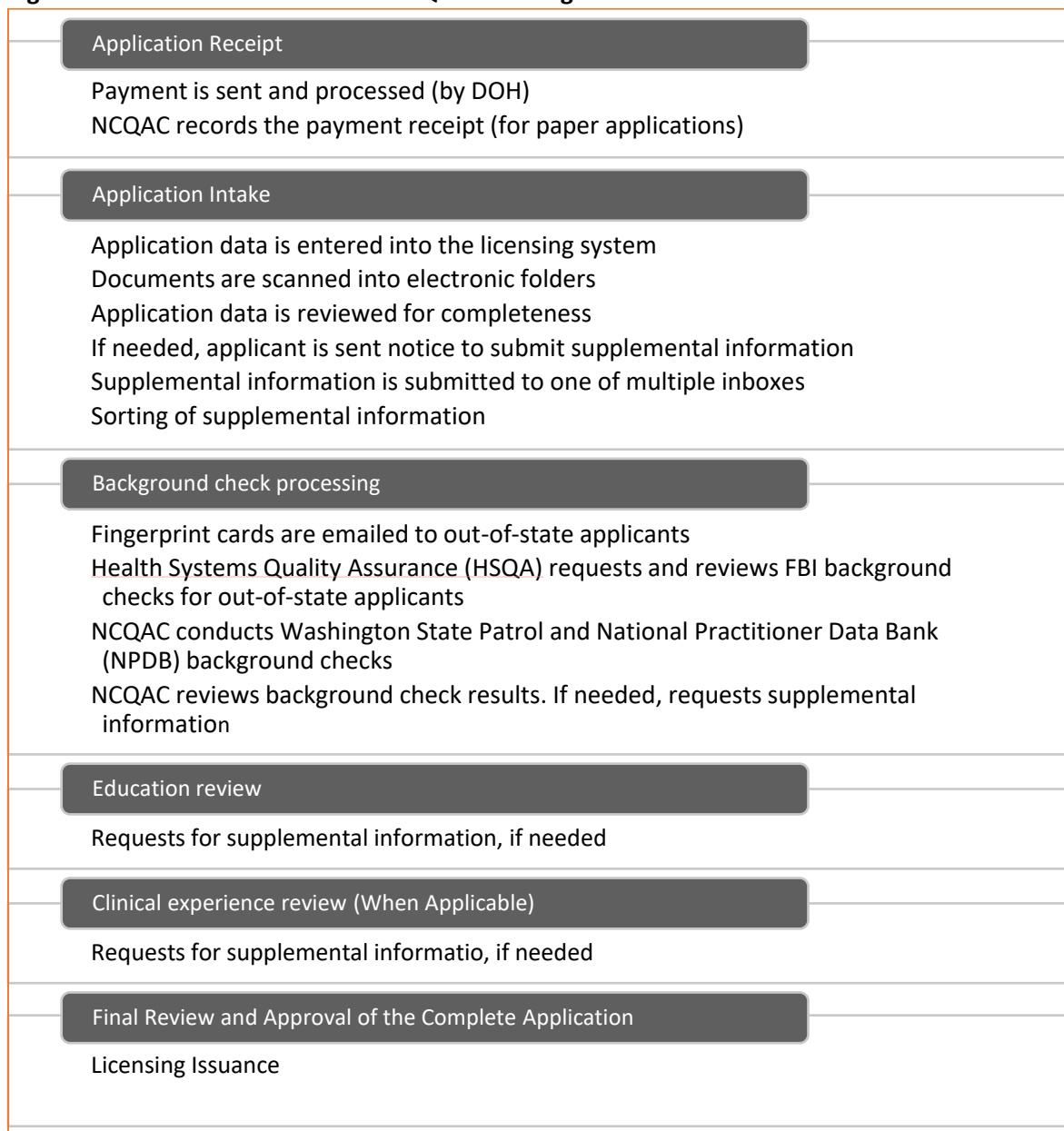
First-time License (by exam):	Nurse Professional Licensed Outside of Washington State (by endorsement):
1. Licensed practical nurse (LPN)	5. Licensed practical nurse (LPN)
2. Registered nurse (RN)	6. Registered nurse (RN)
3. Advanced registered nurse practitioner (APRN)	7. Advanced registered nurse practitioner (APRN)
4. Nursing technician (NTEC)	8. Nursing technician (NTEC)**

*TPPs are issued to all applicants who meet all license requirements while the FBI fingerprint background check is pending.

**Student nurses are not licensed. Only education and employment are verified.

Source: TAP International analysis of NCQAC licensing process.

Figure 3: General Overview of the NCQAC Licensing Process



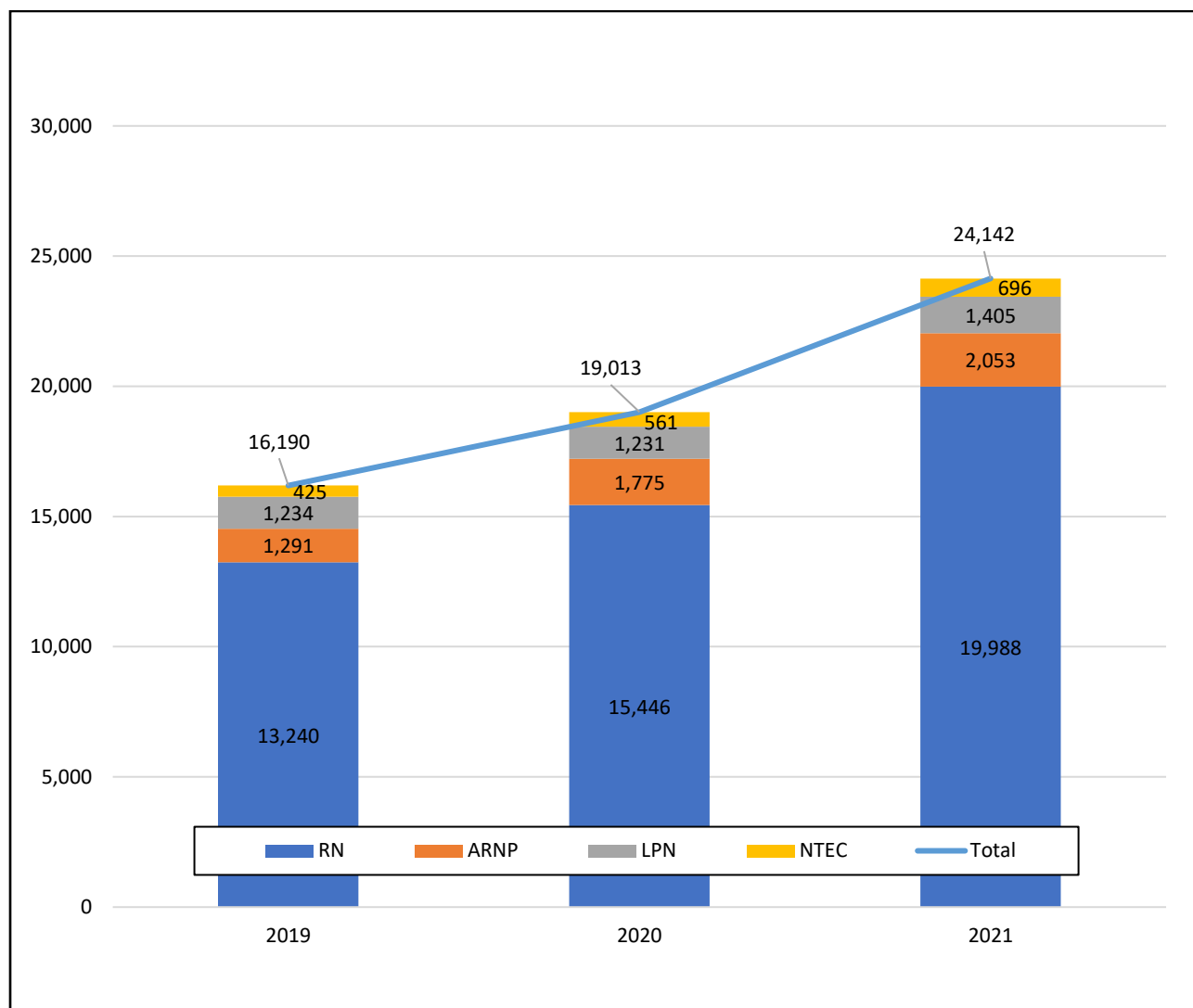
Source: TAP International analysis of NCQAC licensing process.

How Many Licensing Applications Are Received by NCQAC?

NCQAC received about 59,000 applications from nursing students (exam applications) and experienced nurse professionals (endorsement applications) seeking licenses to work in the State of Washington between calendar years 2019 and 2021, representing an average increase of almost 4,000 applications per year, or a 49 percent increase over that time span. Most licensing applications (about 66 percent) came from out-of-state and/or overseas between 2019 and 2021. Most applications originating from outside Washington State each year (89 percent in 2021) are for a Registered Nurse license, compared to the

other licensing types. **Figure 4** below shows growth in licensing applications received by NCQAC by the type of application.

Figure 4: NCQAC Application Growth by Application Type, 2019-2021



Source: TAP International analysis of NCQAC licensing data.

Audit Objectives

The Washington State Legislature requested the Washington State Auditor’s Office to conduct a performance audit of NCQAC’s licensing process.² The State Auditor’s Office contracted with TAP International in 2022 to address the following:

² The 2022 Washington State Budget [Engrossed Substitute Senate bill (ESSB) 5092, section 222 (41) and (42)] requires the Nursing Care Quality Assurance Commission (NCQAC) to contract with the Office of the Washington State Auditor (SAO) for a performance audit examining the length of time required by the NCQAC to license individuals who come from other states, and any obstacles contributing to any delay and make recommendations for improvements. In April 2022, the SAO contracted with TAP international to conduct a performance audit that satisfies the requirements of the 2022 state budget law.

1. How long does NCQAC take to process permanent licenses for out-of-state applicants?
2. What factors, if any, contribute to possible delays in the out-of-state licensing process?
3. What could NCQAC do to improve licensing processes for out-of-state applicants?

Scope

The scope of work included:

- Evaluating NCQAC's licensing processes. The key components included application intake, background checks, education and clinical experience requirements reviews, and final review and approval of the application.
- Computed and compared the timeliness of application processing for 59,000 applications for a new license or a license renewal received by NCQAC between the audit period of January 1, 2019, to December 31, 2021, across four types of licenses:
 - Licensed Practical Nurse (LPN);
 - Registered Nurse (RN);
 - Advanced Registered Nurse Practitioner (ARNP);
 - Nursing Technician (NTEC).

The scope of the audit did not include:

- Conducting a cost allocation audit of fees charged as part of the application process to determine whether NCQAC is recouping the cost of labor and time for license processing.
- Examining the accuracy of fee payment, posting, and deposits.
- Assessing the NCQAC disciplinary process.
- Estimating the impact on NCQAC's revenues and application volumes if Washington were to join the Nursing Licensure Compact.
- Assessing timeliness for Nursing Assistant applications, which the DOH processes, not NCQAC.
- Evaluating the implementation of a new licensing system, Health Care Enforcement and Licensing Management System, or HELMS, sponsored by the DOH.
- Comparing licensing timeliness between states because of the variations in licensing requirements and lack of access to primary data.

Methods Used to Address the Audit Objectives

The Auditor conducted a mixed-method analysis of the licensing process as described in Appendix B.



KEY RESULTS

- ❑ **Licensing Timeliness**
- ❑ **Process Challenges**
- ❑ **Other State Practices**

KEY RESULTS

NCQAC REQUIRES ABOUT 10 WEEKS TO PROCESS A PERMANENT NURSING LICENSE FOR OUT-OF-STATE APPLICANTS

Section Highlights

- In the absence of having a timeliness goal to complete the entire licensing process, this study, alternatively, relied on the average turnaround time from the beginning of the process to the end. In 2021, NCQAC averaged 71 days (about 10 weeks) to process permanent licenses for out-of-state applications, which reflects a return to 2019 average timeliness (pre-COVID), attributed to the scanning of documents into electronic folders and adding staff after experiencing a year-over-year increase in application growth due to COVID.³ Having to add staff, however, suggests that the manual nature of the current licensing process is not sustainable to keep up with the continued increases in licensing applications forecasted for NCQAC. In addition, without establishing a timeliness goal for the entire licensing process, NCQAC does not have the benefit of measuring and reporting on its success, or in detecting early warning signs of problems delaying processing.
- The State Legislature has established an NCQAC timeliness goal of seven days for the final segment of the licensing process – review and approval of completed applications. NCQAC met this goal most of the time because it is an area that NCQAC does not need to depend on the applicant or other entities. It is important to note that measuring and reporting on this last segment of the licensing process excludes virtually all of the processing time needed to issue a license. Other states offer alternate methods for measuring the timeliness of application processing, such as starting and stopping the clock when measuring timeliness while the agency waits for information from other entities, including other state and law enforcement agencies, nursing schools, and the applicant.
- Timeliness differed among various application types with the Registered Nurse applications requiring the longest time to process. In addition, out-of-state applications took longer to process in comparison to applications originating from within Washington State. Despite the variation in timeliness attributed to different processing requirements, NCQAC has not developed individual performance goals that account for these key differences. Without having these specific performance goals to help set expectations, it limits its ability to make continuous process improvements across their many applications. NCQAC staff explained that the absence of performance goals impacts the ability of nurse applicants to effectively plan for or make informed decisions about future employment.

³ NCQAC may issue a TPP (prior to issuance of a permanent license) pending completion of the FBI fingerprint background check.

NCQAC's Full Licensing Process Returned to Pre-COVID-19 Pandemic Average Turnaround Times for Out-of-State Applications

According to the US Government Accountability Office, performance goals are the specific results an agency expects its program to achieve in the near term. Performance measures can show the progress an agency is making in achieving performance goals. Although not required, NCQAC has not established formal goals to complete its entire licensing process as measured from the receipt of the application to the approval of a license. NCQAC officials explained that measuring the entire process would require capturing the time incurred by delays that are outside of its control. For the first five segments of the licensing

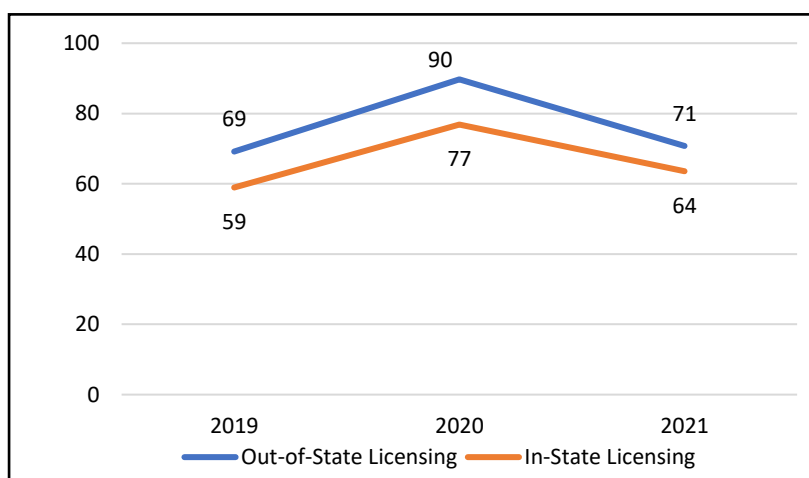
process, NCQAC shares responsibility with the applicant and other agencies to acquire all the information needed to complete the application. For example, the applicant provides their fingerprints for the background check, then NCQAC waits to obtain the results from HSQA and law enforcement agencies. NCQAC has shared information with prospective applicants on its website about expected processing times, which vary depending on the type of application, ranging from about two to 10 weeks. Without establishing a formal timeliness goal for its entire licensing process, an alternative measure was used in the analysis of licensing timeliness: average turnaround time from the finalized application's receipt to the license issuance.

Out-of-state applications required, on average, 71 days, or ten weeks, to fully process the 13,697 applications received in 2021.⁴ **Figure 5** shows the average turnaround time between 2019 and 2022, which fluctuated and illustrated that NCQAC successfully returned to 2019 (pre-COVID) timeliness levels by 2021.

10-12 weeks

The average turnaround time to complete the full licensing process for all applications originating from out-of-state between 2019 and 2021.

Figure 5: Average Turnaround Time (in Days) of the Full Licensing Process for Out-of-State Applications



Source: TAP International analysis of NCQAC licensing data.

⁴ Average is for all permanent license types, including those that may be deficient to due missing documentation. The median processing times for out-of-state applications were 59 days (2019), 72 days (2020) and 64 days (2021). See Appendix A for more information.

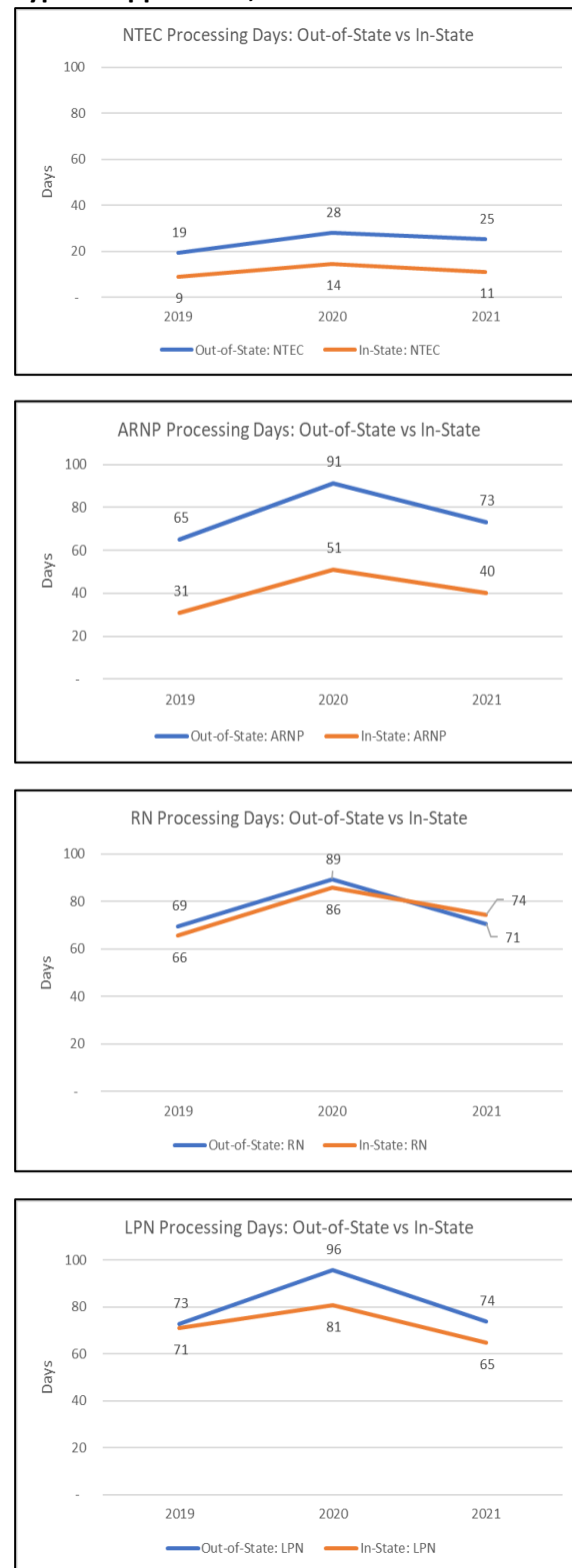
NCQAC attributed the improvement to two factors: (1) NCQAC adopted the use of scanned documentation to allow for remote work by staff during the COVID pandemic, and (2) the hiring of 12 additional staff. NCQAC's current performance in processing applications (about ten weeks) may not be sustainable over time should application growth continue to increase without additional increases in staff or business process improvements because forecasted estimates from 2019 to 2021 data show an anticipated continued 15 to 21 percent year-to-year increase.

Out-of-State Applications Take Longer to Process Than In-State Applications Across Most License Types

When comparing timeliness across license types for applications originating from outside Washington State (excluding international applications), NCQAC processed NTEC applications the quickest at 25 days (3.5 weeks). For this type of application, NCQAC staff verify education and experience only. Applications for LPNs, RNs, and ARNPs required more time to process in 2021, averaging about 71 to 74 days (10.5 weeks) from their receipt to licensing because of additional licensing requirements. See **Figure 6**. Despite the differences in timeliness among application types, NCQAC has not developed individual performance goals to help set expectations for completing the licensing process. Without establishing formal goals, NCQAC limits its ability to proactively identify and address factors that cause delays in application processing or opportunities to make the process more efficient.

NCQAC's timeliness for applications across selected states varied. Applications received

Figure 6: Timeline of Application Processing by Type of Application, 2019- 2021



Source: TAP International analysis of NCQAC licensing data.

from three states represented the largest sources of out-of-state applications: Texas (seven percent), Oregon (six percent), and Florida (six percent). For 2021, applications originating from Oregon had the fastest processing time of 56 days (about eight weeks) compared to 71 days (about ten weeks) for Texas and 73 days for Florida. See **Figure 7**. NCQAC licensing staff said some state medical boards take longer to respond to documentation requests, which could explain the longer processing times for Florida and Texas. **Appendix A** shows timeliness by the state of origin and by application type.

Figure 7: Application Timeliness (in Days) by State of Origin

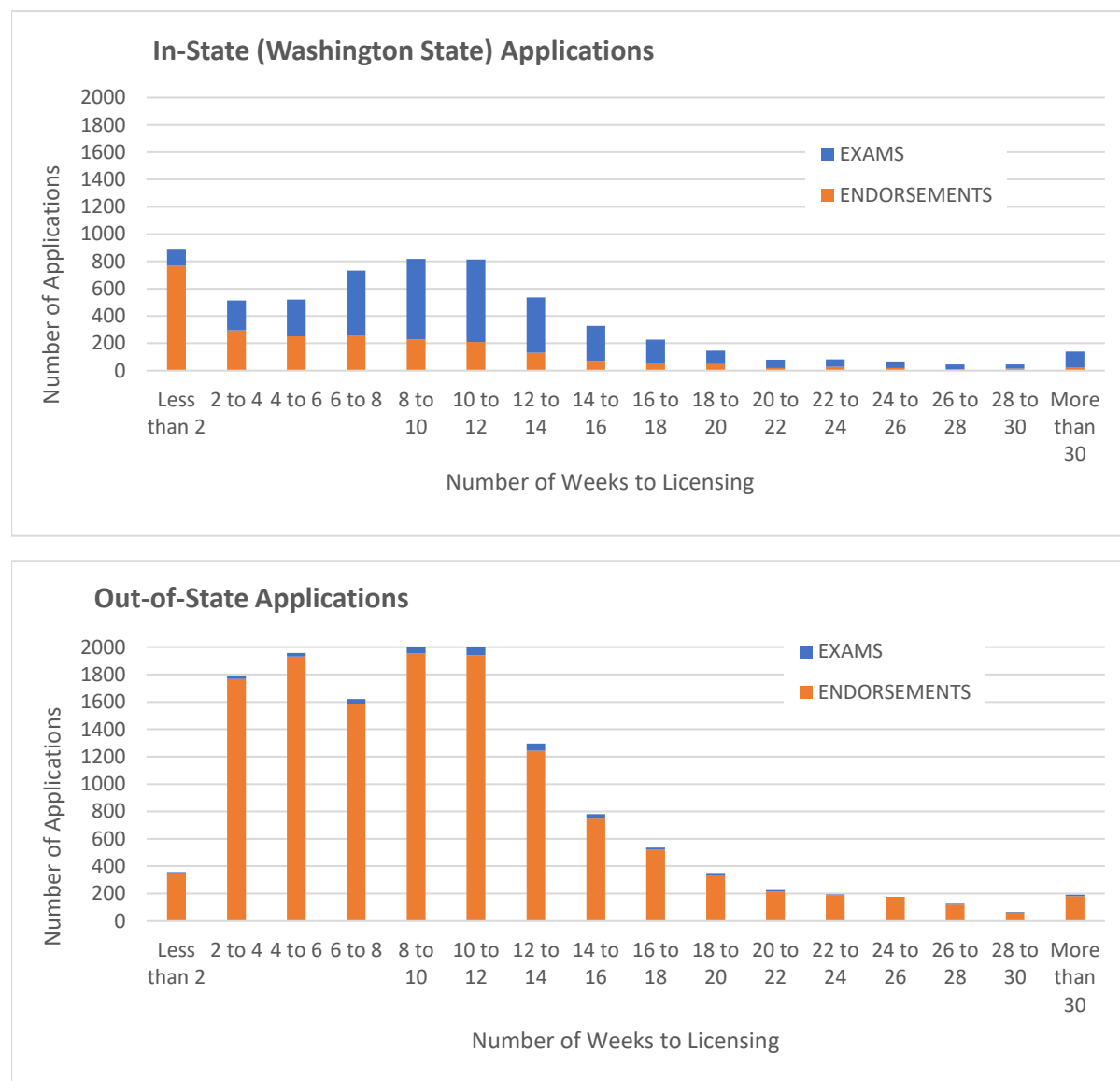
Application Origin	2019	2020	2021	Average	# of Licenses Issued
Oregon	65	79	56	66	2,829 (6%)
Texas	74	95	71	78	3,042 (7%)
Florida	69	90	73	77	2,571 (6%)
All Other States (excluding WA Texas, Florida, Oregon, and International)	69	91	72	76	22,365
Washington (in-state)	59	77	64	67	19,379
International ⁵	127	118	90	108	385

Source: TAP International analysis of NCQAC licensing data.

Timeliness also differed between the origins of endorsement applications. More endorsement applications received from in-state mailing addresses experienced quicker processing times in comparison to endorsement applications received from out of-state mailing addresses. For 2021, NCQAC frequently processed in-state endorsement applications in two weeks or less (while out-of-state endorsement applications generally required two to 14 weeks to process. Applications by exam followed a similar distribution of processing times with each other regardless of whether the application had an in-state or out-of-state mailing address. See **Figure 8**.

⁵ International applications averaged 108 days from application receipt to licensing. NCQAC staff explained that lengthy process times stem from various issues, including language barriers, the inability of the applicant to obtain transcripts from their home government, and Washington's added requirement to take an English proficiency exam. Arizona's nursing licensing board reported experiencing similar challenges with international applicants.

Figure 8: Comparison of Processing Times for In-State and Out-of-State Applications by Method of Licensing in 2021



Source: TAP International analysis of NCQAC licensing data. Out-of-state applications do not include international applications.

NCQAC Met its Seven-Day Goal for Final Processing of Most Applications

NCQAC has a seven-day goal to complete the last segment of the licensing process – final review and approval for all types of licensing applications⁶. For out-of-state applications, NCQAC met this goal for 95 percent of the 30,807 licenses processed between 2019 and

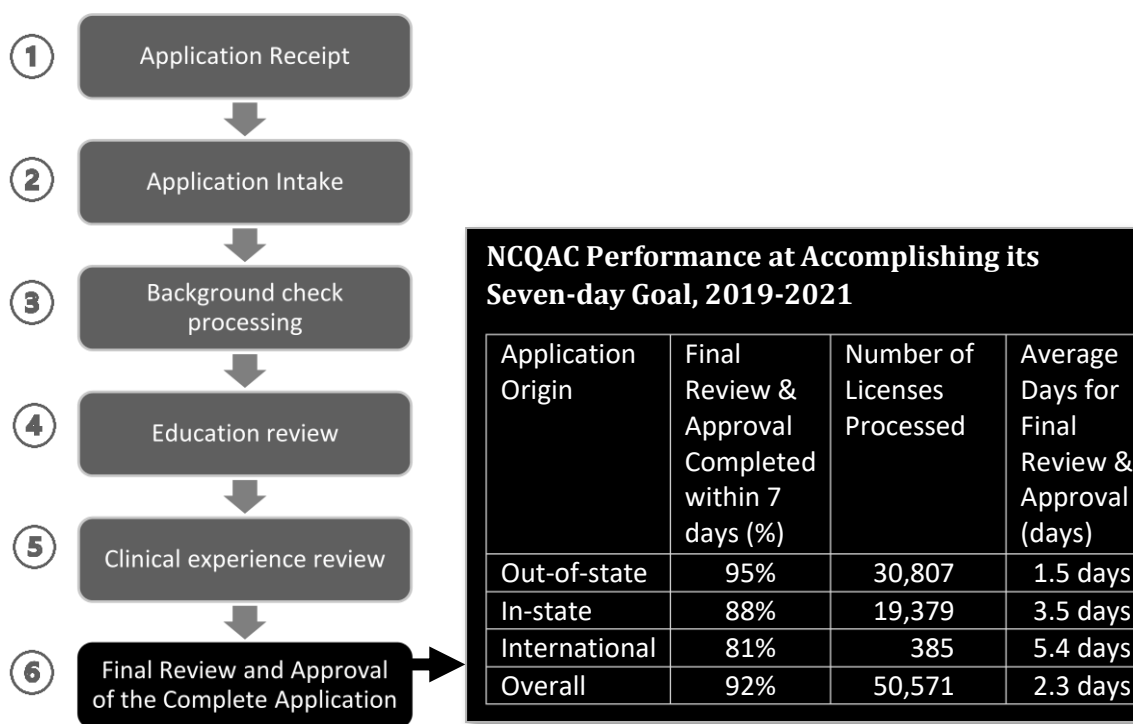
⁶ A 14-day measure was adopted in 2009 and changed to a seven day goal in 2022 by the State Legislature.

2021, averaging 1.5 days to license issuance, as shown in **Figure 9**. For the remaining five percent of out-of-state applications that were not processed within seven days, timeliness ranged from eight to 993 days over the expected timeframe, averaging 19.4 days.⁷ For 191 of these applications NCQAC required more than 30 weeks, or 270 days, to issue a license.

NCQAC processed fewer in-state applications within seven days, about 88 percent of 19,379 applications, averaging about 3.5 days. For the remaining 12 percent of applications that were not processed within seven days, timeliness ranged from eight to 594 days over the expected timeframe, averaging 16.9 days. For 141 of these applications, NCQAC required more than 30 weeks to issue a license.

When measuring the performance of the last segment only (see **Figure 9** - final review & approval of the complete application), this excludes 99 percent of the actual time required to complete the entire licensing process. NCQAC management explained they measure the final segment of the process,⁸ a DOH-required measure, because NCQAC has complete control over the timeliness of its execution. However, without measuring timeliness for the entire licensing process, NCQAC will not have the data it needs to monitor the timeliness and effectively make data-driven process improvements.

Figure 9: Overview of the NCQAC Licensing Process



Source: TAP International analysis of NCQAC licensing data.

⁷ NCQAC policy B18.02 states that an application will close after 60 days, if there is no activity recorded to process the license. An application can stay open as long as there is activity recorded.

⁸ NCQAC management explained timeliness is measured from receipt of an application with all requirements submitted to issuance of a TPP.

Other States Use Alternate Methods for Measuring Timeliness

Although methods differed, officials from all six states participating in this review reported measuring the timeliness of their entire licensing process. For instance, one state measures timeliness from application receipt to license issuance but starts and then stops the timer for tracking timeliness. The state stops the timer when it requests supplemental information from the applicant. The tracking of time begins again upon receipt of the supplemental information. The same stop-and-start occurs when requesting FBI background checks and waiting for information from international applicants. State officials reported using this method of excluding delays due to external dependencies allows for an understanding of the total time an application requires to be processed, which provides a more meaningful indicator reflective of their licensing model.

Review of comparable operations allows for the identification of different strategies or perspectives about implementation methods.

Two other states track the timeliness of the first segment of the licensing process that reviews the initial completeness of the application upon its submittal to the issuance of the first notification of deficiency. Another two states have statutory requirements for completing the initial segment of the application process within a set amount of time. For example, one state must complete an initial review of the application within 14 days of receipt.

The remaining state must issue a license within 30 days of receiving a completed application that includes all required documentation. Various officials from these states described the same concern as NCQAC when it comes to measuring the full licensing process because some key components are out of the control of the licensing entity.

NCQAC Accomplished Faster Processing for Renewals

Prior to the expiration of a nursing license, nurse professionals can renew their license upon submitting supporting documents verifying compliance with continuing competency hours. NCQAC has improved its timeliness for renewing ARNP licenses and maintained about the same speed for (less than one day) for renewing other license types despite year-to-year increases in renewal applications received. See **Figure 10**.

Figure 10: Timeliness of Renewal Processing, 2019 to 2021 (in days)

	2019	2020	2021	Three-Year Application Average
ARNP	3.2	2.4	1.9	2.4
LPN	0.0	0.1	0.1	0.1
NTEC	0.0	0.1	0.0	0.1
RN	0.1	0.1	0.1	0.1
Average turnaround time	0.2	0.3	0.2	0.2
Application volume	114,643	118,666	119,998	Total Volume: 353,307
Source: TAP International analysis of NCQAC renewal applications.				

PRIMARY FACTORS CONTRIBUTING TO LONGER PROCESSING OF OUT-OF-STATE APPLICATIONS

Section Highlights

- NCQAC staff consistently reported on three factors that could create longer application processing times: completing background checks, requesting supplemental information, and reviewing course curricula to ensure regulatory compliance. Other key contributing factors include the current design of the licensing model, outdated technology, and NCQAC's staffing strategy. These factors and other challenges contributed to processing delays between one and 950 days.
- NCQAC expects to experience continued challenges in maintaining licensing performance due to anticipated growth in the volume of applications for nursing licenses submitted to NCQAC each year, fueled by the expansion of telemedicine and a continuing need for nursing professionals in Washington State.

Required Criminal Background Checks

Out-of-state applicants must complete an FBI background check to receive a license.⁹ A criminal background check is a common requirement across the U.S., including when obtaining a multistate nursing license.¹⁰ The scope of the FBI background check reviews criminal history throughout the United States.¹¹ HSQA, the agency within the DOH responsible for submitting fingerprints to investigative agencies, reviews the results of each background check completed by the State Patrol or FBI and records "hits" for every incident regardless of its nature or age. The applicant may need to provide additional information about each "hit" if they did not provide explanatory details as instructed when initially submitting their application.

The NCQAC licensing staff reported that during 2020, up to six months lapsed between an applicant's submission of fingerprints and the receipt of FBI background check results. By 2021, HSQA received timelier results from the FBI. Officials from HSQA reported that Washington State Patrol implemented improvements in 2022 to expedite the fingerprinting processes. This led to receiving and recording results in about five days, excluding the time required to request and receive the fingerprints from the applicants. Despite these improvements, NCQAC staff reported that NCQAC assigns one person to receive and review the results of the background checks (and, if needed, request

⁹ NCQAC may also issue a TPP when all requirements are completed except for the FBI fingerprint background check. The NCQAC conducts a background check for out-of-state applicants regardless of if the applicant had a recent background check.

¹⁰ The Uniform Licensure Requirements for a Multistate License under the NLC requires the applicant to submit to state and federal fingerprint-based criminal background checks, has not been convicted or found guilty, or has entered into an agreed disposition, of a felony offense under applicable state or federal criminal law; and has no misdemeanor convictions related to the practice of nursing (determined on a case-by-case basis); is not currently a participant in an alternative program; and is required to self-disclose current participation in an alternative program.

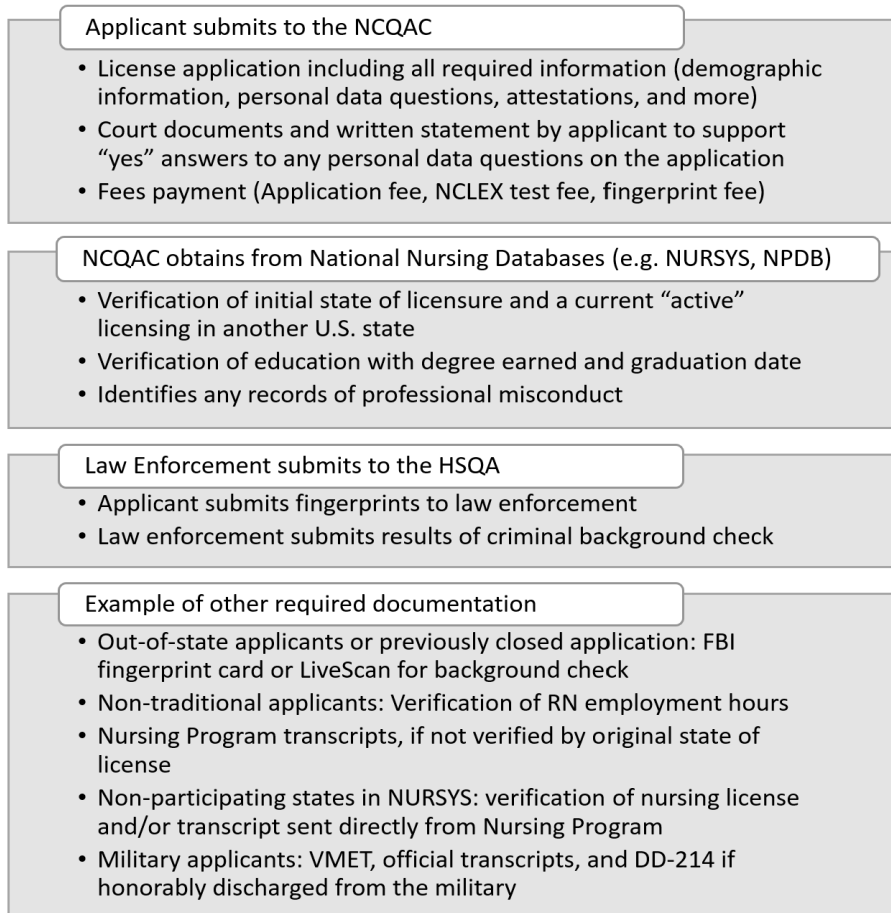
¹¹ The scope of the Washington State Patrol examines criminal history within Washington State.

supplemental applicant information) and explained that bottlenecks occur when this person falls behind or is out of the office. According to NCQAC management, several staff are trained in how to review background check results. In addition, the NCQAC website explains that processing may take longer if an applicant has any missing answers on their application, if the application has unusual circumstances, and if NCQAC receives a higher volume of applications than usual.

Issuance of Deficiency Letters

If NCQAC has a question or needs additional information to consider an application complete, NCQAC issues the applicant a “deficiency” letter depending on the type of application.¹² Of the 5,820 out-of-state applications that exceeded the average processing time of 10 weeks (71 days) in 2021, NCQAC issued a deficiency letter for almost all of them (5,806), or 99.8 percent.¹³ **Figure 11** shows that applying for a nurse license requires NCQAC to obtain documentation from several sources, including the applicant, to complete a Licensed Practical Nurse or Registered Nurse

Figure 11: Key Documentation Required for Application Processing of a Nurse Already Licensed by Another State (by endorsement) for a Licensed Practical Nurse or Registered Nurse



¹² To determine if licensing requirements are met under RCW 18.79.110 and WAC 246-840 for Registered Nurses (RN), Licensed Practical Nurses (LPN), Nursing Technician (NTEC), and Advanced Registered Nurse Practitioners (ARNP) applicants, NCQAC administers separate review procedures for endorsement applications and exam applications because the type of information required differs between them. Review procedures can also vary by the type of licensing application. For example, ARNP applicants who request prescriptive authority, must show evidence of education in advanced pharmacotherapeutics.

¹³ Over the period of 2019-2021, 98.5% of all out-of-state licenses had deficiency letter issued.

application. For some sources, the applicant initiates the provision of the documentation to NCQAC, while for other information, NCQAC obtains it directly.

NCQAC staff reported issuing deficiency letters contributed to a lengthier licensing process. For each deficiency letter sent, the applicant has up to 30 days to submit the required information. As a result, a review of one application may require issuing a deficiency letter multiple times.¹⁴ NCQAC management explained many applicants received deficiency notices because the applicant did not read the application instructions, and many deficiencies could have been avoided had they have done so. Despite NCQAC revamping the application instructions and questions multiple times, application instruction issues have persisted.

RCW 18.79.160 requires NCQAC to collect information about the education of all applicants. This requirement coupled with WAC 246-840-030 requires NCQAC to verify the education curriculum provided by out-of-state applicants. The requirement applies to all types of nursing schools, including accredited and nonaccredited schools.


Upon receiving a deficiency letter, additional delays occur when applicants mail or email the required documentation. Under each route, when received by NCQAC, the documents must be manually sorted and forwarded to the requester. At the time of our review, NCQAC staff reported a two-week backlog to sort through hundreds of documents submitted by applicants. The manual sorting of documents has led to the misplacement of documents. NCQAC does not use readily available technology, such as bar codes, to process electronic or manually submitted information received from the applicant or other entities.

Administrators at two nursing school programs reported that graduating students applying for their first license reported difficulties in responding to the deficiency letters within the 30 days. For example, a graduating student requested the school to send their transcript, which had to be submitted through the mail, and then processed by NCQAC, but this process was not completed within 30 days. The graduating student had to reapply and pay the application fees again, a financial burden to many students. Another example is when graduating students, after receiving a deficiency letter, postpone or do not pass the National Council Licensure Examination (NCLEX) and must reapply and pay another application fee. An administrator reported that the success rate for first-time passage of the NCLEX exam declined because students took the exam before they were ready.

Course Curriculum Checks

Another factor contributing to lengthier processing times is the requirement for NCQAC to verify the course curriculum of applicants who graduated from out-of-state nursing schools. NCQAC management and staff reported that additional time is needed to review

¹⁴ If the applicant fails to submit the required information, the file becomes closed as incomplete. Should the applicant submit supplemental information after NCQAC closes the application, the applicant must re-apply. In 2021, there were 128 applications that had a pending status upon receipt of supplemental information as of September 1, 2022.



the education credentials of first time applicants, applicants who attended non-traditional nursing schools, and applicants graduating from nursing schools in other states, particularly from certain nursing schools in Florida, which presently are automatically subject to additional review. International applicants also required time for review of their education qualifications. NCQAC does not track the timeliness of this licensing process segment to determine the amount of time spent reviewing course requirements.

Licensing experts from national associations explained the United States' framework for licensing nurses state-by-state has led to each state validating the quality of out-of-state nursing school's course content versus only verifying that applicants met the nursing school's requirements.¹⁵ Other external stakeholders further raised the issue that transcript reviews may not be needed for out-of-state applicants who attended accredited nursing schools. Some NCQAC staff have agreed while others explained the added assurance was needed to provide quality nurses in the state, especially in light of fraudulent nursing education program issues occurring in the state of Florida. One of the six other states reviewed eliminated the requirement to review each applicant's courses and transcript if the applicant graduated from certain nursing schools. The state verifies that the applicant has graduated but does not routinely request the applicant's transcript unless a need arises to do so.

Current Licensing Model Design

NCQAC's licensing process has multiple components that rely on different entities to provide information about the applicant before review and approval of the application. As previously described in this report, these components variously include: (1) receipt of fingerprints provided by the applicant; (2) background checks administered by the Washington State Patrol or the FBI; (3) verification of graduation provided by nursing schools; (4) transcripts to be provided by out-of- state nursing schools; (5) exam results to be provided by testing agencies, and (6) supplemental information requested by NCQAC, which requires time to request and receive the information. As a result, the licensing process places the burden on NCQAC versus the applicant to assemble a completed application that demonstrates the applicant's compliance with the state's licensing requirements. In addition, the licensing process has led to excessive fragmentation when staff spend anywhere from one minute to 15 minutes completing a single component of the licensing process before moving the application forward in the process. Depending on the type of application and its complexity, up to 16 different physical touches on an application may occur throughout the licensing process.¹⁶ If one person cannot perform a function for a period of time, it creates bottlenecks in the licensing flow without action from management to address the absence.

¹⁵ Nursing schools vary state-by-state in their requirements for graduation although each state nursing board sets the educational requirements for graduation and licensing.

¹⁶ Based on analysis and interviews of licensing staff.

Use of Outdated Technology

NCQAC's licensing model is not yet fully automated, and applicants' ability to update their applications is limited upon submission for processing. NCQAC presently must use, as required by DOH, a licensing and disciplinary system called Integrated Licensing and Regulatory System (ILRS) to support its licensing process, despite a free licensing system being available – Optimal Regulatory Board System (ORBS). ILRS, implemented in 2008 and used across the DOH and other commissions, is nearing the end of its life cycle. Comprised of eleven applications and eighteen databases, ILRS has significant gaps in functionality that have led to lengthier processing times. A key gap is the absence of online account creation so that individual applicants can upload supplemental information directly linked to their application.


By 2024, the DOH, with financial support from NCQAC, plans to complete a new Health Care Enforcement and Licensing Management System (HELMS), designed to address key gaps in ILRS functionality and support the licensing needs across 89 professions and 359 licensing types.¹⁷ At the time of our review, Washington Technology Solutions (WATECH) officials reported delays in the completion of the new system. The delays include a six-month pause in its implementation from September 2021 to February 2022, subcontractor terminations, and underestimating project complexity. As a result, the project had not progressed with the completion of planned “stories”—a series of system goals written from the software user’s perspective. At the time of our review, implementation efforts were behind.¹⁸ While HELMS offers a promising solution allowing for scalability and timelier

Without additional action, NCQAC's licensing processing challenges will continue as current and new trends emerge.

¹⁷ The design of the new HELMS system is expected to:

- View and manage information from one site.
- Allow employers of multiple providers to perform bulk licensing renewals.
- Enable electronic notifications on license expiration, status changes, disciplinary actions, and continuing education due dates.
- Improve data security, support electronic records management, and improve access to information
- Reduce outbound and inbound mail processing for renewal and other processes through online transactions.
- Provide electronic access to facility inspection and/or investigation reports.
- Allow consumers visibility to provider specializations and practice locations.
- Enable patients and others who have filed complaints against practitioners and facilities to check complaint status online.
- Share records securely, and more efficiently, with regulatory boards, commissions, and committees.
- Provide more efficient access to performance measures by way of reporting dashboards.)

¹⁸ Forty-seven of 146 planned stories should have been completed, but 40 have actually been completed; and, of 1,082 requirements, 1055 remain to be configured although the project was planned to only have 964 remaining. Project management reformulated the implementation plan to reduce user testing and simplified the system configuration to provide basic licensing functionality across the different application types. A feature planned for the HELMS system for NCQAC -- HELMS-UC-973 -- was to automate the acquisition of third-party nursing education records into the licensing system. There is uncertainty about the implementation of this feature -- because the configuration plans contain a placeholder to potentially include



processing of nursing licenses, these significant issues reported about its implementation have caused repeated delays and reduced functionality. NCQAC can likely expect continued challenges in trying to keep pace with demand for licensing if the DOH further delays the implementation of HELMS and does not meet the expectations for system functionality.

NCQAC's Staffing Strategy

NCQAC has a staff of 24 responsible for specific tasks within each segment of the licensing process. For example, variously assigned staff may perform process activities, such as initial application review, background check processing, sorting supplemental information received, and call desk coverage. Staff may also perform any of these activities based on specific application types: endorsement, exam, or international. Some NCQAC licensing staff we interviewed explained that when they shift time and attention to other areas of the licensing process where application demand may be high, it creates backlogs in their work and lengthier processing times. For example, in 2021, applications requesting nursing licensing by exam began to increase in March for early applicants through May for applications submitted upon graduation. While NCQAC responds to application growth by shifting staff to where the need is, the data shows that NCQAC cannot sustain its average timeliness performance when peak demand occurs because of the backlogs that arise in other areas as shown in **Figure 12**. **Figure 12** illustrates the highest turnaround times for endorsement applications happen in the first half of the year when exam application growth occurs. The results show that the staffing strategy of shifting resources based on peak volume has created inefficiencies in other areas. As a result, the length of delay beyond NCQAC's average processing time ranged from one to 950 days.¹⁹ NCQAC management explained that shifting staff is necessary to address all the work required.

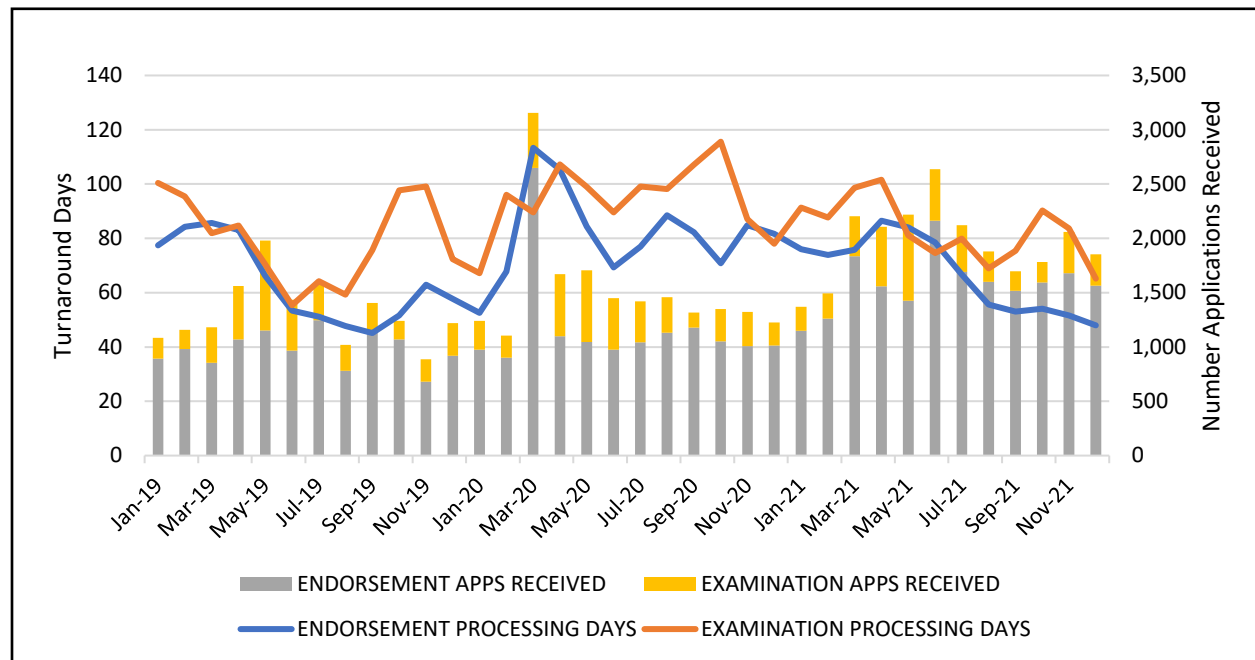
NCQAC recently developed a staffing projection model and noted challenges in accurately predicting the volume of endorsement applications compared to exam applications. NCQAC is expected to continue to experience a 15 to 21 percent growth in application volume for nursing licenses submitted each year, fueled by current and emerging trends related to the ongoing need for nursing professionals in Washington State and the expansion of telemedicine.²⁰

a variety of automated mechanisms for receiving application related records. At present, a NCQAC staff person must log into the third-party system to access and download education records, and then manually upload the records into the licensing system.

¹⁹ NCQAC management explained that exam growth occurs during this time because nursing students apply several months before graduation and prior to sitting for the exam.

²⁰ Industry forecasts expect a 13 to 27 percent increase (depending on the study) in use of video technology to provide care to patients across state boundaries, increasing the potential for licensing application growth within Washington State because a healthcare provider must be licensed by the state where the patient is located.

Figure 12: Timeliness and Application Volume by Month



OTHER STATES OFFER ALTERNATIVE PRACTICES TO DEVELOP SCALABLE LICENSING PROCESSING

Section Highlights

- Other state licensing models offer potential opportunities to enhance the efficiency and effectiveness of NCQAC's licensing process by modernizing processes to accomplish increased scalability. Examples of key initiatives include using automation tools like artificial intelligence bots and eliminating the need for transcripts from accredited nursing schools.
- Should NCQAC opt for implementing process enhancements, it will not likely adversely impact the disciplinary process, as evidenced by the few complaints filed among applicants who received a TPP pending the results of background checks.

Use of Automation to Reduce Dependency on Manual Processing

Of the six states whose licensing processes were compared with the NCQAC process, distinguishing features and/or tools were identified among five that allowed their state to keep up with their reported application growth, as shown in **Figure 13**. For instance, a state licensing manager said her nurse licensing unit implemented Artificial Intelligence (AI) bots to read and transfer information into their licensing system. The official further said other plans are underway to expand their use of AI bots, which has prevented the need to hire additional staff. This state official explained that an outdated licensing system drove the changes.

Use of best practices can boost efficiency.

In another key area, two states that are not members of the Nursing Licensure Compact (NLC) plan to use or are currently using ORBS, which is a software solution for license management and discipline enforcement across the career span of a nurse. Owned by the National Council State Boards of Nursing (NCSBN), ORBS does not require NLC membership to use. ORBS provides modules for licensing, discipline, and education program management functions. One state official said it plans to use the ORBS system because it seamlessly integrates with other systems containing information to verify other states' licensing, disciplinary actions, and education records. This feature has a placeholder in the HELMs project plan but without further detail. An official from the other state said it switched to ORBS in 2018 because the process is more automated, with much of the background information needed for an applicant already available electronically.²¹

²¹ A state official explained that a challenge is to educate applicants on how to use self-service tools and that based on feedback from applicants, the state has revised how information is presented to an applicant. Governments routinely use customer satisfaction surveys to assess service delivery.


NCQAC Issue/Challenge for Out-of-State Application Processing	Option to Address Issues/Challenges
Manual data entry of application information into ILRS	Use of Artificial Intelligence Bots to file documents received via email.
Review of education curriculum	Eliminate the requirement to include transcripts unless requested.
Reactive staffing strategy	Dedicate staff to specific application types to expedite processing because of staff's specialized knowledge, although staff are cross trained for emergencies. ²² Customer service techs process applications when needed.
Use of outdated technology	Leveraged free use of ORBS, a licensing system administered by the NCSBN.
Manual sorting of documents	Online portal that allows applicant to check application status instead of call center. An online portal allows applicants to upload supplemental information at time of application. ²³

Membership in the Nurse Licensing Compact Offers Another Alternative to Keep Pace with Application Growth

[illegible]

²² NCQAC licensing staff reported having difficulty in becoming knowledgeable of all the requirements applicable to each licensing type. Appropriate internal controls and management approval would still be contained in new approaches.

²⁴ If an applicant does not meet the NLC uniform requirements, the applicant may be eligible for a license to practice only within the state to which they applied for a license.



territories currently participate in the NLC. According to the NCSBN, more than two million multistate licensed nurses can practice across NLC member states without additional licensing. In April 2023, the Washington State Legislature passed, and the Governor signed, legislation to join the NLC. The law also requires employers in Washington State who hire nurses practicing with an active multistate license under the NLC, and do not have a Washington state nursing license to: (a) verify and report multistate license nurses to the Nursing Commission; (b) attest that the nurse has met the State's Suicide Prevention Training requirement; and (c) attest that the nurse has updated and submitted their demographic data survey to the national nursing database(Nursys).

Two of the six states included in our peer review are NLC members and reported other impacts that NCQAC can likely expect with their new membership.

- *Reduced demand for application processing amid consistent annual growth.* One state reported that NLC membership had reduced the number of applications requiring full licensing. Officials estimated an additional 3,500 applications annually would need to be processed if it were not a member of the NLC. The NCSBN website explains the advantages of a multistate nurse's license to practice telenursing, distance teaching, working across state borders, travel nursing, being a military spouse, or a federal disaster worker.
- *No impact on staffing.* Another member state reported that membership provided a more cohesive licensing process. However, NLC membership had little to no impact on staffing levels. A shift in roles and responsibilities took place by assigning a person to be a multistate license specialist, research issues, respond to applicant questions, and identify/resolve duplicate multistate licenses with other member states.
- *No impact on current licensing processes.* A state official explained that potentially joining the NLC will likely have little impact on its licensing process. Most states already have similar licensing processes reflected in the uniform requirements. In addition, managers in both NLC member states reported that membership had not addressed common challenges to processing licenses for out-of-state applicants. For example, the required criminal background that takes weeks to receive the results from law enforcement agencies.

Managers from another two of the four states, which are not members of the NLC, reported foreseeing no disadvantages with NLC membership. However, in the other two non-member states, managers discussed potential risks about the potential impact of NLC membership on their state's licensing processes. These concerns include:


- *Reduced ability to protect public health through licensing.* Under the NLC, a nurse holding a multistate license is not required to inform the state board of nursing when working in that state. Officials expressed concern that multistate licensing requirements cannot track where multistate licensed nurses work.

- *Uncertainty about ownership and effectiveness of the disciplinary processes.* One state official said the NLC does not fully address ownership among state boards for the discipline of nurses working outside the state that issued their multistate license. Under the compact, only the state board issuing the multistate license may take disciplinary or adverse action against the multistate license; even if the violation occurred in another compact member state. The NLC member state where the nurse works can report the violation to the home compact state, and under the compact rules, the home state must treat the reported conduct received from a remote state as it would if the conduct occurred in the home state. Compact rules also allow licensing boards the authority to complete any pending investigation should a nurse change their primary state of residence during the investigation. NLC member states gain access to other states' disciplinary files, expediting action if a violation occurred in the state where the multistate licensed nurse was practicing.
- *Cessation of power over licensing requirements to join NLC governance.* If a member state wants to change the multistate licensing process, it must gain approval from all compact members instead of voting through the state's own board of nursing or its legislature. Under the compact, the head of the state's licensing board serves as a member of the interstate commission governing the NLC, with one vote for each state member, and the NLC may adopt rules and bylaws for all member states. However, the state retains control over the requirements for a license to practice within that state.
- *Two-tiered requirements for education/training within the state.* Requirements for continued education are another method state nursing boards use to ensure public safety. One state official said a concern is nurses with multistate licenses would not be required to complete training in certain areas, such as human trafficking and bias that would be imposed on nurses holding a single-state license. The official said this would create confusion and some nurses falling out of compliance with the state's requirements. A nurse working under a multistate license does not have to attest that they have met the equivalent continuing education requirements of every state where they practice, only their home state.
- *A potential decline in revenues if out-of-state applications decline.* Officials from two states reported concerns that licensing fees would fall with NLC membership. However, one member state reported no revenue decline because application growth has remained consistent.

Potential Impact on NCQAC's Licensing Process from NLC Membership

Based on the uniform licensing requirements and discussions with other states and NCQAC management, as Washington State begins its membership of the NLC, there may be multiple impacts on the NCQAC licensing process. These impacts could include:

- *Increase in processing times for Washington State applicants interested in multistate licensing.* NCQAC does not require Washington State residents to complete an FBI background check when applying for a license. If a Washington resident wanted a



multistate license, this would be an additional step in the licensing process for nurses currently licensed to practice in Washington State.²⁵ This report previously describes that an FBI background check can lengthen processing time. NCQAC management said, for out-of-state applicants, NCQAC would likely receive fewer applications for licensing from applicants who already hold a license in a compact participating state, and this reduction in volume could help address application growth and processing times in other areas.

- *NCQAC gains early access to evidence in disciplinary investigations.* NCQAC would have greater access to information gathered by other member states during disciplinary investigations, expediting NCQAC's disciplinary process, rather than having to wait until another state board takes disciplinary action against a licensed professional in Washington State,
- *Streamlining NCQAC's out-of-state licensing process.* For out-of-state applicants, NCQAC would not have to implement the licensing process for nurses from other states with an NLC license.

Streamlining of NCQAC's Licensing Process Should Not Adversely Impact its Disciplinary Process

In response to the delays caused by FBI fingerprint-based background checks, the Washington State Secretary of Health has adopted permanent rules to allow the issuance of TPP. A TPP allows the nursing professional to begin work upon meeting all licensing requirements pending receipt of the required background check results.²⁶ During the COVID pandemic, most states participating in this review relaxed requirements for state licensing to practice within the state.

Analysis of NCQAC disciplinary data shows that expediting the licensing process may not adversely impact public safety, as shown in **Figure 15**. Fewer complaints were reported as a percentage of TPPs, or emergency volunteers, compared to the number of complaints as a percentage of active nursing licenses. Less than one percent of 7,704 TPPs issued by NCQAC in 2020-2021 had a complaint filed against the licensee. Similarly, volunteer nurses who held a Washington State license comprised less than one percent of 2,137 sampled complaints.²⁷ NCQAC management explained that individuals who applied for the Emergency Volunteer program but were deemed by NCQAC as “not eligible” to work as an Emergency Volunteer (due to attendance at a suspicious nursing education program) were

²⁶ At the time of this audit, NCQAC officials stated while Washington State implements the NLC, nurses in compact states still need a Washington state nurse license to practice in Washington until further notice. The NCQAC had not yet issued guidance on whether a TPP would be issued under the forthcoming multistate license process.

²⁷ If volunteers are registered in the volunteer health practitioner system and verified to be in good standing in all states where they are licensed, they may practice in Washington without obtaining a Washington license once activated and assigned by DOH. Applications are screened by the DOH to ensure the potential volunteer's health license is in good standing in each state they where they are licensed. DOH referred complaints against these volunteer nurses to the NCQAC for processing.

encouraged to apply for a license instead so that NCQAC could conduct a full review of their nursing education prior to working in Washington State. Officials from one state said the emergency declarations that led to nurses successfully practicing without a detailed review of education and criminal background has raised questions about the future of traditional approaches to licensing.

Figure 15: Number of Complaints Recorded Against Temporary Practice Permits and Emergency Volunteers Licensed in Washington State

Temporary Practice Permits	Emergency Volunteers	Active Nursing Licenses
Between 2020 and 2021, 11 complaints were filed against a licensee with a TPP, representing: <ul style="list-style-type: none"> – 0.1% of 7,704 TPPs issued, and – 0.2% of 4,405 complaints received. 	Between 2020 and 2022, at least 0.8 percent (18) of 2,137 complaints reviewed were filed against an Emergency Volunteer (EV) with a WA license number.	In 2020 and 2021, the number of complaints represented less than two percent of active nursing licenses: <ul style="list-style-type: none"> – 1.7% of active licenses (2,235 complaints/133,245 licenses) – 1.5% of active licenses (2,170 complaints/143,626 licenses)

Source: TAP International analysis of NCQAC licensing database and DOH data.

OTHER ISSUES IMPACTING NURSE LICENSING²⁸

Section Highlights

- Other inefficiencies in licensing processing include regulatory requirements that do not reflect the current licensing environment. NCQAC staff and stakeholders, respectively, identified two outdated regulatory licensing requirements – related to clinical experience and attestation by nursing school administrators – that create an obstacle to obtaining a license without additional benefit to public safety. Nursing school officials explained the attestation requirement by Washington State nursing school administrators is unnecessary and should be updated.
- A procedural gap exists in how NCQAC determines which background check an applicant receives. For example, an out-of-state applicant for a Washington State nursing license can avoid an FBI background check if they use a Washington State mailing address on their application, which triggers a background check by the Washington State Patrol.
- NCQAC could provide greater reporting transparency to the Governor on its licensing timeliness by explaining the nuances of its statistics such as disclosing the populations from which the statistics are drawn across the tables included in the Governor's report.

Outdated Regulatory Licensing Requirements

NCQAC's licensing process is governed by a set of regulations and internal processing requirements to accomplish NCQAC's role of regulating the competency and quality of licensed nursing professionals. The regulatory requirements that present obstacles to nurse availability are described below.

Out-of-State Clinical Experience Requirement

WAC 246-840-048 and WAC 246-80-090 require NCQAC to accept out-of-state applicants who graduated from non-traditional nursing schools and may not have completed a clinical component in their program. Out-of-state applicants must complete at least 1,000 hours of clinical experience in another state to be eligible for a license to work in Washington State. During the COVID pandemic, the Governor waived this clinical experience requirement for out-of-state nursing professionals to practice under an emergency volunteer program in Washington State. When the emergency volunteer program expired, to continue working in Washington State, nursing professionals needed to apply for permanent licensing from NCQAC. Staff at NCQAC reported the law is clear that the 1,000 hours of clinical experience must occur out-of-state, so out-of-state nurses' clinical experience received within Washington State during the COVID pandemic cannot be counted towards this requirement. This requirement may limit the ability of NCQAC to address the nurse

²⁸ This section applies to the issuance of licenses to practice in Washington State. NCQAC has not yet implemented its process to comply with Nurse Licensure Compact requirements for issuing multistate licenses.

shortage in the state, which according to the local public health association officials interviewed for this report, has a significant impact on the state's rural areas.²⁹ NCQAC management explained this created a unique circumstance which NCQAC had never seen before and is why it is not addressed in NCQAC rules, but is recognized as an issue that needs to be addressed.

Educational Attestation Requirement

WAC 246-840-025 requires applicants for a nursing license to submit an attestation from the nurse administrator of the board-approved nursing program from which they graduated. The nurse administrator must attest to the applicant's capability to safely practice within the scope of practice for a practical nurse and registered nurse. Nursing school officials explained this requirement is unnecessary and should be updated, stating that if the nurse graduated from the school and passed the nursing exam, the nursing student is deemed qualified by the school. NCQAC management explained the requirement is necessary because – occasionally and recently – staff finds that a Washington State nursing education program mistakenly adds a student to the certificate of completion lists, which allows the student to sit for the NCLEX exam. However, when NCQAC receives and reviews the student's official transcript, NCQAC finds that the student never graduated or completed their nursing education program.




Nearly half of the NCQAC licensing staff reported that the regulatory complexity of the licensing process created by Washington State and Commission requirements impacts the overall efficiency of the licensing process.

Procedural Gap in NCQAC Determining Which Background Check an Applicant Receives

An out-of-state applicant can avoid an FBI background check by using a Washington State mailing address on their application. NCQAC licensing staff are aware of this possibility and explained that avoidance of the background check occurs because the mailing address shown on the application determines if the application originates in-state versus out-of-state. As directed by the DOH, NCQAC staff applies different requirements for background checks depending on an application's origin: out-of-state applicants must have an FBI conducted background check, examining criminal records nationwide, compared to applicants from within Washington State, who must have a Washington State Patrol conducted background check, examining criminal records in Washington State only. For out-of-state applicants using a Washington state mailing address, an applicant's criminal past in other states would not be identified when requesting only a Washington State

²⁹ NCQAC had to deny 435 applicants for the emergency volunteer program for various reasons, including questionable nursing education or disciplinary action. Applicants deemed "not eligible" for the emergency volunteer program were encouraged to apply for the full licensing process so that a full review of their nursing qualifications could be completed.



Patrol background check. About 17 percent of the 44,856 out-of-state applications (by endorsement) received by NCQAC during 2019-2021 had a Washington mailing address. NCQAC management explained that the Commission had previously supported the idea of requiring FBI fingerprint background checks for all applicants.

NCQAC's Reports Could Provide Greater Transparency of its Licensing Timeliness

NCQAC reports monthly to the Governor's office on its timeliness in processing out-of-state applications for a nursing license. In these reports, NCQAC reported a timeliness of 26 days in April 2021 for TPPs. Some internal and external stakeholders participating in this review reported NCQAC's success to us in the licensing process – using the NCQAC reports to the Governor as their source of information – without realizing the data reflects only a subset of applications. NCQAC could provide greater reporting transparency in its reports to the Governor by explaining the nuances of its statistics such as disclosing the populations from which the statistics are drawn across the tables included in the Governor's report.



APPENDICES

APPENDIX A: LICENSING PERFORMANCE

Figure 16: Processing Timeliness (in Days) by Out-of-State and In-State Application Types, 2019-2021

Application Origin	2019 Average	2020 Average	2021 Average
WA State (In-State)	59	77	64
Out-of-State (All US States except WA)	69	90	71
International	127	118	90
TOTAL	65	84	69

Application Origin	2019 Median	2020 Median	2021 Median
WA State (In-State)	46	68	57
Out-of-State (All US States except WA)	59	72	64
International	59	66	70
TOTAL	55	70	62

Application Origin – Washington State (In-State)	2019	2020	2021	2019-2021 Average	2019-2021 Median	2019-2021 Minimum	2019-2021 Maximum	2019-2021 # of Applications
ARPN	31	51	40	41	28	1	373	2,134
LPN	71	81	65	72	57	0	994	2,072
NTEC	9	14	11	11	6	0	319	1,446
RN	66	86	74	76	66	1	1,047	13,727
TOTAL	59	77	64	67	57	0	1,047	19,379

Application Origin – US States Outside WA	2019	2020	2021	2019-2021 Average	2019-2021 Median	2019-2021 Minimum	2019-2021 Maximum	2019-2021 # of Applications
ARPN	65	91	73	78	66	0	432	2,606
LPN	73	96	74	80	64	1	483	1,030
NTEC	19	28	25	25	14	0	142	58
RN	69	89	71	75	64	0	1,022	27,113
TOTAL	69	90	71	76	64	0	1,022	30,807


Application Origin – International	2019	2020	2021	2019-2021 Average	2019-2021 Median	2019-2021 Minimum	2019-2021 Maximum	2019-2021 # of Applications
ARPN	30	104	55	77	57	14	286	20
LPN	125	87	385	149	125	14	385	6
NTEC	--	--	--	--	--	--	--	--
RN	129	121	90	109	65	1	1,029	359
TOTAL	127	118	90	108	65	1	1,029	385

Figure 17: Processing Timeliness (in Days) by State of Origin and Application Type

Application Origin - Oregon	2019	2020	2021	2019-2021 Average	2019-2021 Median	2019-2021 Minimum	2019-2021 Maximum	2019-2021 # of Applications
ARPN	56	80	72	70	56	3	326	350
LPN	83	104	63	80	60	7	483	224
NTEC	40	10	27	23	19	1	81	9
RN	64	77	53	64	50	1	654	2,246
TOTAL	65	79	56	66	52	1	654	2,829

Application Origin - Texas	2019	2020	2021	2019-2021 Average	2019-2021 Median	2019-2021 Minimum	2019-2021 Maximum	2019-2021 # of Applications
ARPN	65	89	72	77	63	6	379	329
LPN	72	102	80	84	70	7	373	94
NTEC	--	--	--	--	--	--	--	--
RN	74	95	70	78	65	4	694	2,619
TOTAL	74	95	71	78	65	4	694	3,042

Application Origin - Florida	2019	2020	2021	2019-2021 Average	2019-2021 Median	2019-2021 Minimum	2019-2021 Maximum	2019-2021 # of Applications
ARPN	76	91	71	80	69	1	399	183
LPN	66	115	88	84	63	18	434	71
NTEC	--	--	2	2	2	2	2	1
RN	69	90	73	76	66	3	1,022	2,316
TOTAL	69	90	73	77	66	1	1,022	2,571



Application Origin – All Other States (except WA, OR, TX, and FL)	2019	2020	2021	2019-2021 Average	2019-2021 Median	2019-2021 Minimum	2019-2021 Maximum	2019-2021 # of Applications
ARPN	66	94	74	79	68	0	432	1,744
LPN	70	92	75	78	64	1	426	641
NTEC	18	32	26	25	14	0	142	48
RN	69	90	72	76	66	0	828	19,932
TOTAL	69	91	72	76	66	0	828	22,365

	2019																							
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average											
ARNP	58	62	75	54	43	38	31	35	35	46	68	47	47											
LPN	82	99	65	85	70	47	66	55	74	77	82	94	72											
NTEC	10	12	9	10	11	15	4	6	19	4	4	7	9											
RN	84	88	87	86	70	57	55	51	52	58	71	60	68											
Total	80	85	83	81	64	53	53	50	51	57	69	61	65											

[illegible]

	2021												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average
ARNP	72	76	79	76	67	60	57	51	49	43	42	43	60
LPN	72	77	67	75	87	72	70	62	62	60	61	55	68
NTEC	18	11	7	9	10	10	15	18	17	13	8	13	11
RN	80	76	81	93	84	80	71	58	56	60	59	51	72
Total	77	74	78	86	79	76	69	57	55	56	57	49	69

	2019													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average	
ARNP	78	82	96	76	66	61	56	55	52	71	89	54	70	
LPN	99	88	91	112	66	49	52	57	39	52	66	67	68	
RN	84	89	94	89	72	57	56	52	49	55	68	61	69	
Total	85	89	94	89	71	57	55	53	49	56	69	61	69	

	2020													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average	
ARNP	64	61	119	113	96	85	98	99	102	76	86	101	94	
LPN	58	81	107	118	89	88	66	102	96	79	85	83	89	
RN	54	74	124	112	93	75	83	91	84	75	90	88	89	
Total	55	73	123	112	93	76	85	92	86	75	89	89	89	

	2021												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average
ARNP	92	94	96	93	87	91	80	61	64	48	50	48	74
LPN	85	80	73	73	78	85	79	57	53	51	63	74	71
RN	81	80	79	90	89	82	70	58	55	57	54	49	70
Total	82	81	80	89	89	83	71	58	56	56	54	49	70

	2019																		
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average						
ARNP	93	77	48	76	43	36	31	34	44	66	43	28	48						
LPN	194	55	259	175	90	57	81	76	--	135	290	61	135						
RN	160	96	164	92	79	68	68	42	107	174	106	77	94						
Total	136	84	136	95	73	51	48	40	67	126	120	68	81						

	2020																			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average							
ARNP	66	71	83	77	66	37	74	66	91	51	52	45	64							
LPN	--	192	--	272	204	111	224	126	483	107	233	--	172							
RN	87	76	134	94	106	86	92	131	112	169	101	104	108							
Total	82	98	123	101	104	77	96	118	134	141	103	98	104							

	2021																	
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Average					
ARNP	47	68	48	70	65	66	80	66	11	28	30	31	56					
LPN	42	321	98	193	100	78	90	92	131	173	147	--	132					
RN	126	76	99	113	96	91	91	75	47	108	78	64	90					
Total	98	85	91	116	93	84	90	75	62	93	75	62	88					

APPENDIX B: METHODOLOGY

TAP International completed the following activities for this review.



Audit Objective 1: How long does NCQAC take to process permanent licenses for out-of-state applicants?

- Reviewed NCQAC's statutory, regulatory, and timeliness requirements for licensing processing, including but not limited to Engrossed Substitute Senate Bill 5092, RCW 18.79.160, RCW 18.130.050 (13), WAC 246-840-025, WAC 246-840-030, and WAC 246-840-090.
- Conducted statistical analysis that:
 - determined the number of licensing applications received for calendar years 2019, 2020, and 2021;
 - computed timeliness of licensing for each licensing application type using two methods. The first method captured the number of days between the date NCQAC received the application and the date of approval for licensing. The second method captured the number of days between the date NCQAC began the final review of the application and the date of approval for licensing;
 - compared timeliness data against established performance goals;
 - compared the timeliness of NCQAC's processing of licenses for applicants submitting applications from within the state and from out-of-state.
 - identified the states that generated the largest volumes of out-of-state applications and compared overall timeliness between states;
 - assessed overall timeliness of licensing pre-COVID-19 (2019) and during COVID-19 (2020 and 2021);
 - examined the timeliness of licenses processed under new procedures established by NCQAC in response to the pandemic.
 - computed timeliness for renewals to assess the entirety of the NCQAC's licensing activities.
- Interviewed 17 NCQAC Commission members, management, and staff to discuss how their current performance has helped or hindered the State's ability to respond to health emergencies, such as COVID-19.
- Estimated future out-of-state licensing workload volumes based on historical data and trends; and determined whether timeliness and backlog issues may continue.
- Assessed the impact of NCQAC's licensing process on its ability to accomplish public safety goals and the impact on NCQAC's ability to meet Washington's future public health care needs.



Audit Objective 2: What factors, if any, contribute to possible delays in the out-of-state licensing process?

- Reviewed the requirements for NCQAC licensing and the NCQAC instruction manual(s) for license processing.
- Analyzed the business process through process matrix analysis for each licensing process step to assess the impact of each step on timeliness. The analysis evaluated each operational and internal control factor listed below as a potential obstacle to timely out-of-state application processing include:
 - backlogs in license processing;
 - organizational structure as an independent commission;
 - staffing strategies, levels, and the experience of NCQAC processing staff, including the impact of COVID-19;
 - use of information technology and other tools;
 - training activities;
 - reliance on other entities (i.e., submission by nursing schools of graduate education certifications, FBI/state police background checks, requesting applicant follow-up information for documentation in the licensing process).
- Interviewed NCQAC licensing staff, management, and select Commission members to discuss when and under what circumstances, delays or other inefficiencies occur, how applications are assigned, the events that would slow or expedite processing, and the efficiency and effectiveness of application review activities.
- Observed NCQAC licensing staff process two out-of-state applications.
- Conducted six interviews with licensing expert officials from six other state licensing agencies.
- Conducted four interviews discussing the licensing process with officials internal to the Washington State government, including management from the DOH, staff at the Department of Finance, and HSQA officials.
- Conducted eight external stakeholder interviews with five professional and public health nursing associations and three nursing schools in Washington to discuss licensing process customer satisfaction, application process improvement opportunities, and current and emerging trends potentially impacting the licensing process.
- Evaluated factors that are within and outside of the Commission's control.




Audit Objective 3: What could the NCQAC do to improve licensing processes for out-of-state applicants?

- Conducted a comparative analysis of other licensing programs in six states. Two of these states belong to the NLC, which allows out-of-state nurses licensed in their home state to practice in other member states without obtaining additional licenses. Information obtained from the six states included:
 - strategies for measuring the effectiveness, timeliness, and obtaining documentation to demonstrate compliance with licensing requirements, background checks, and license renewal;
 - advantages and disadvantages of joining the NLC or entering into interstate licensing agreements;
 - state board licensing process, performance, and factors that lead to expedited or delayed application processing, including the types of information technology used;
 - current and emerging challenges within the nursing industry that impact licensing requirements or processes, including COVID-19 and telemedicine.
- Interviewed NCQAC management and select commission members to discuss:
 - the impact that current out-of-state licensing processes have had on accomplishing program goals and objectives, timeliness, and the availability of nurses (including responding to COVID-19);
 - if the current process is structured to meet present and emerging challenges, what impacts the ability to meet future public health needs;
 - how NCQAC plans to address anticipated application volume increases;
 - the impact of information technology and operational-related improvements on timeliness.
- Studied HELMS and the licensing process impact in our development of recommendations included in this report.³⁰
- Estimated the cost and resource needs of any potential improvement to the licensing process.

Audit Disclosures and Limitations

The National Council of State Boards of Nursing (NCSBN), which oversees the NLC, did not respond to the Auditor's multiple requests for a meeting to discuss the audit's objectives. In addition, the Auditor made unsuccessful attempts to discuss background check processing and information sharing with the Washington State Patrol and to discuss nurse licensing with nursing officials from the Washington universities.

³⁰ The goal of the HELMS system is to improve data security, support electronic records management, and improve access to information.



TAP International entered into data-sharing agreements with the State Auditor's Office (SAO), the Washington DOH, and the NCQAC to obtain access to databases containing licensing information. These agreements prohibited the use of information that could potentially identify a licensee.

The audit experienced time delays due to limitations in extracting data from the NCQAC's licensing system and the effort to ensure its accuracy upon receipt of the information.

Factors Related to Auditor Independence

The U.S. Government Accountability Office, whose standards TAP International is statutorily obligated to follow, requires the assessment of factors impairing Auditor independence. The Auditor did not encounter interference by NCQAC or other stakeholders or other impairments that impacted the timeliness, validity, or reliability of the information described in this report.

Assessment of the Reliability of Data


The U.S. Government Accountability Office standards require assessing the sufficiency and appropriateness of computer-processed information to support our findings, conclusions, and recommendations.

In performing this audit, TAP International relied upon multiple databases containing applications for initial licensing, renewals, and TPPs obtained from NCQAC. This information was extracted from the commission's electronic licensing system, ILRS. NCQAC prepared these databases by writing a custom query. Generally, DOH's business office staff complete a quality assurance review of data extracted from ILRS to ensure its accuracy and completeness. NCQAC's internal review did not occur for this request, and the Auditor performed quality assurance activities of the data. These activities included database review for duplicate entries, data anomalies, data input errors, data electronic performance testing, and interviewing staff members knowledgeable about the data because a data dictionary supporting data field identification was unavailable for proprietary reasons. The Auditor also interviewed staff on methods and activities implemented to ensure that the information systems captured accurate and complete information.

TAP International found significant discrepancies in the data, which included duplicate transactions, data input errors, and missing information. These discrepancies and other errors were either excluded from the analysis or corrected to provide the Auditor with sufficient evidence to support our findings, conclusions, and recommendations.

Assessment of Internal Control

Generally accepted government auditing standards require an assessment of internal controls if internal controls are applicable to the audit objectives. Internal controls are processes, procedures, and other tools management can use to help an entity achieve its objectives and comply with applicable laws and regulations.



The Auditor conducted an internal control assessment for one of the three audit objectives: licensing timeliness. Overall, the deficiencies in internal controls described adversely impacted NCQAC's ability to provide timely licensing.

Audit Statement

TAP International conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that the audit be planned and performed to obtain sufficient evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. TAP International believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives. A draft report was provided to the NCQAC executive management for comments on the recommendations. See **Appendix E** for NCQAC's response to the recommendations included in this report.

APPENDIX C: COST ESTIMATE TO IMPLEMENT RECOMMENDATIONS

Recommendation 1: Improve the process for collection of FBI background checks with the Health Systems Quality Assurance (HSQA) agency for licenses by endorsement and multistate licenses. For applicants seeking a license to work only in Washington State, allow NCQAC greater flexibility, under RCW 18,130.064, in the collection of criminal background checks, such as allowing background check exemptions if the applicant can demonstrate a recently completed criminal background check.			
Potential Benefits: Decreases license processing time for applicants seeking a license to work only in Washington State.			
Timeframe: Six to 12 months to update policy and obtain commission approval and work with State legislature to modify State rules.			
	Labor Hours	Rate	Amount
Administration/Project Management: Develop business case and request for change to the Secretary of Health. [Manager Level]	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Governance: Present to and obtain initial Commission approval for changes to criminal background check collection. [Executive Level]	60-100 hours	\$110/hr.	\$6,600 - \$11,000
Staffing:	Additional staff not required		
Training:	Part of Operations		
Operations: Implementation of new procedures	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Information Systems, Material, Equipment:	None		
TOTAL			\$12,200 - \$19,400

Recommendation 2: Eliminate the requirement for transcripts from NCQAC-approved nationally accredited nursing schools located in Washington State when the nursing school also provides lists of its graduates to NCQAC and allow NCQAC the discretion to request transcripts when needed.			
Potential Benefits: Decreases license processing time.			
Timeframe: Six to 12 months to update policy and obtain commission approval and work with State legislature to modify State rules.			
	Labor Hours	Rate	Amount
Administration/Project Management: Develop business case and request for change to the RCW. [Manager Level]	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Governance: Present to and obtain initial Commission approval and work with State legislature to update RCW requirement. [Executive Level]	80-120 hours	\$110/hr.	\$8,800 - \$13,200
Staffing:	Additional staff not required		
Training:	Part of Operations		
Operations: Implementation of new procedures. [Manager Level]	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Information Systems, Material, Equipment:	None		
TOTAL			\$14,400 - \$21,600

Recommendation 3: Update the license application to collect the applicant's state of residency, physical address, and mailing address.			
Potential Benefits: Identifies applicants who have lived outside of Washington state rather than solely relying on the applicant mailing address.			
Timeframe: Six to 12 months to update policy and implement new application and data collection procedures.			
	Labor Hours	Rate	Amount
Project Management: Develop new application and staff procedures for data collection. [Manager Level]	80-120 hours	\$70/hr.	\$5,600 - \$8,400
Staffing:	Additional staff not required		
Training: 24 licensing staff and 16 hours training preparation.	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Operations: Implementation of new procedures and updated application form (online and hardcopy). [Manager Level]	80-120 hours	\$70/hr.	\$5,600 - \$8,400
Information Systems, Material, Equipment:	None		
TOTAL			\$14,000 - \$21,000

Recommendation 4: Update the WAC to allow out-of-state applicants from non-traditional nursing schools, who completed 1,000 hours of clinical experience within Washington State under the authority of Chapter 70.15 RCW and the declared state of emergency for COVID-19 to be eligible for licensure to work only in Washington State.			
Potential Benefits: Addresses lapse in clinical experience requirement and increases pool of eligible nursing applicants.			
Timeframe: Six to 12 months to update policy and obtain commission approval and work with State legislature to modify State rules.			
	Labor Hours	Rate	Amount
Administration/Project Management: Develop business case and request for change to WAC. [Manager Level]	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Governance: Present to and obtain initial Commission approval and work with State legislature to update WAC requirement. [Executive Level]	80-120 hours	\$110/hr.	\$8,800 - \$13,200
Staffing:	Additional staff not required		
Training:	Part of Operations		
Operations: Implementation of new procedures. [Manager Level]	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Information Systems, Material, Equipment:	None		
TOTAL			\$14,400 - \$21,600

Recommendation 5: Establish and compute a measure(s) that provide for other assessments of licensure timeliness and performance. Options to consider include:			
a. Establish goals and compute measures for overall and specific timeliness across applications measuring the actual application processing time, including out-of-state applications, and applications for multistate license from application receipt to license issuance.			
Potential Benefits: Provides performance measures and information on specific application types for the entire licensing process.			
Timeframe: Up to 12 months to develop measures and implement data extraction and reporting process.			
	Labor Hours	Rate	Amount
Administration/Project Management: Develop and establish measures across different application types and processes. [Manager Level]	60-80 hours	\$70/hr.	\$4,200 - \$5,600
Administration/Project Management: Work with information technology staff to develop custom reporting and data extracts. [Manager Level]	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Governance: Review and present to Commission [Executive Level]	24-40 hours	\$110/hr.	\$2,640 - \$4,400
Staffing:	Additional staff not required		
Training: Present metrics to staff and development methodology. 24 staff and 16 hours training preparation.	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Operations: Implementation of new metrics, procedures for extracting and reporting. [Manager Level]	60-80 hours	\$70/hr.	\$4,200 - \$5,600
Information Systems, Material, Equipment: Information technology staff time.	40-80 hours	\$70/hr.	\$2,800 - \$5,600
TOTAL			\$19,400 - \$29,600
b. Establish goals and compute measures capturing the application process to provide quantitative data on timeliness or delays, which NCQAC does and does not control, to pinpoint areas for improvement and increased timeliness. These measures should individually capture the timeliness of the intake, background, and educational review processes.			
Potential Benefits: Provides performance measures and information on specific phases of the licensing process to help identify areas for improvement and increase processing timeliness.			
Timeframe: Up to 12 months to develop measures and implement data extraction and reporting process.			
	Labor Hours	Rate	Amount
Administration/Project Management: Develop and establish measures across each phase of the application process to quantify data on timeliness and delays and identify areas for improvement. [Manager Level]	80-120 hours	\$70/hr.	\$5,600 - \$8,400
Administration/Project Management: Work with information technology staff to develop custom reporting and data extracts. [Manager Level]	80-120 hours	\$70/hr.	\$5,600 - \$8,400
Governance: Review and present to Commission [Executive Level]	24-40 hours	\$110/hr.	\$2,640 - \$4,400

Staffing:	Additional staff not required		
Training: Present metrics to staff and development methodology. 24 staff and 16 hours training preparation.	40-60 hours	\$70/hr.	\$2,800 - \$4,200
Operations: Implementation of new metrics, procedures for extracting and reporting. [Manager Level]	60-80 hours	\$70/hr.	\$4,200 - \$5,600
Information Systems, Material, Equipment: Information technology staff time.	40-80 hours	\$70/hr.	\$2,800 - \$5,600
TOTAL			\$23,640 - \$36,600
c. Develop and administer a customer satisfaction survey that gauges customer experiences with licensing timeliness.			
Potential Benefits: Provides feedback to licensing staff and management on areas for improvement.			
Timeframe: Up to 12 months to develop survey, administer survey, collect data, and develop summary report.			
	Labor Hours	Rate	Amount
Administration/Project Management: Develop, review, and approve satisfaction survey. [Manager Level], OR	36-40 hours	\$70/hr.	\$2,800
Administration/Project Management: Develop, review, and approve satisfaction survey. [Consultant]	36-40 hours	\$160/hr.	\$6,400
Governance: Review and present to management for approval [Executive Level]	8 hours	\$110/hr.	\$880
Staffing:	Additional staff not required		
Training: Familiarization with online survey tool. Two primary staff.	8 hours	\$70/hr.	\$560
Operations: Yearly hours to develop survey list, administer survey, collect results, and develop summary report. [Manager Level] OR	80-120 hours	\$70/hr.	\$5,600 - \$8,400
Operations: Yearly hours to develop survey list, administer survey, collect results, and develop summary report. [Consultant]	80-120 hours	\$160/hr.	\$12,800 - \$19,200
Information Systems, Material, Equipment: (example: Survey Monkey) \$900/yr.			\$900/year
Total: Initial Setup (In-House)			\$3,960 - \$4,240
Total: Yearly Operations (In-House)			\$6,500 - \$9,300
Total: Initial Setup (Consultant)			\$7,300 - \$7,840
Total: Yearly Operations (Consultant)			\$13,700 - \$20,100

Recommendation 6: Purchase and implement automated technologies like artificial intelligence bots to scan and extract relevant application information versus manually entering licensing applications into ILRS.			
Potential Benefits: Decreases licensing processing time and decreases workload, allowing for reallocation of staff to other processing area(s).			
Timeframe: Six to 12 months to implement scanning tools and update processes.			
	Labor Hours	Rate	Amount
Administration/Project Management: Project management hours for implementation and integration of scanning tool. [Manager Level]	240-320 hours	\$70/hr.	\$16,800 - \$22,400
Administration/Project Management: Project management hours for implementation and integration of scanning tool. [Consultant]	240-320 hours	\$160/hr.	\$38,400 - \$51,200
Governance: Project oversight by executive management. [Executive Level]	8 hours	\$110/hr.	\$880
Staffing:	Additional staff not required		
Training: Four to six hours training for 24 staff.	96-144 hours	\$70/hr.	\$6,720 - \$10,080
Operations: Implementation of new procedures. [Manager Level]	80-120 hours	\$70/hr.	\$5,600 - \$8,400
Information Systems, Material, Equipment: Application acquisition such as Azure Form Recognizer	Yearly subscription based on pages scanned	Up to 500,000 pages/yr.	\$10,000 - \$12,500
Total: Implementation (In-House)			\$30,000 - \$41,760
Total: Implementation (Consultant)			\$51,600 - \$70,560
Total: Software Application, Yearly Cost			\$10,000 - \$12,500

Recommendation 7: For licenses to work only in Washington State, continue to issue Temporary Practice Permits (TPPs) for applicants, pending receipt of results of federal background checks.			
Potential Benefits: Allow for the continued process of temporary practice permits that allow for applicants to being work in the state prior to receipt of the FBI background checks.			
Timeframe: Immediate			
	Labor Hours	Rate	Amount
Administration/Project Management:	None		
Governance:	None		
Staffing:	No additional staff needed		
Training:	No additional training needed		
Operations:	None		
Information Systems, Material, Equipment:	None		
TOTAL			

Recommendation 8: Modify the licensing process to minimize the number of touches by different staff by adopting an alternative staffing strategy, which includes expanding the areas that individual staff can review.			
Potential Benefits: Decrease license processing time.			
Timeframe: Six to 12 months to update staffing strategy and expand process areas where individual licensing staff can review.			
	Labor Hours	Rate	Amount
Administration/Project Management: Review licensing process workflows and expand responsibility areas of individual staff. [Manager Level]	160-240 hours	\$70/hr.	\$11,200 - \$16,800
Governance: Provide project oversight and review expanded responsibility areas. [Executive Level]	40-60 hours	\$110/hr.	\$4,400 - \$6,600
Staffing:	Additional staff not required		
Training: Updated process workflows may require additional training for individual staff. 8 to 16 hours for 24 staff.	192-384 hours	\$70/hr.	\$13,440 - \$26,880
Operations: Implementation of new procedures and change management. [Manager Level]	160-240 hours	\$70/hr.	\$11,200 - \$16,800
Information Systems, Material, Equipment:	None		
TOTAL			\$40,240 - \$67,080

Recommendation 9. As part of the implementation of the Nurse Licensure Compact, assess alternative strategies, such as assignments of staff to process specific types of licensing applications versus assigning staff based on exam, endorsement, or international applications.			
Potential Benefits: Decrease license processing time.			
Timeframe: Six to 12 months to update staffing strategy and expand process areas where individual licensing staff can review.			
	Labor Hours	Rate	Amount
Administration/Project Management: Review licensing process workflows and expand responsibility areas of individual staff. [Manager Level]	Included in Recommendation 8 above.		
Governance: Provide project oversight and review expanded responsibility areas. [Executive Level]	Included in Recommendation 8 above.		
Staffing:	Additional staff not required.		
Training: Updated process workflows may require additional training for individual staff. 8 to 16 hours for 24 staff.	Included in Recommendation 8 above.		
Operations: Implementation of new procedures and change management. [Manager Level]	Included in Recommendation 8 above.		
Information Systems, Material, Equipment:	None		
TOTAL	Included in Recommendation 8 above.		

APPENDIX D: AGENCY COMMENTS AND EVALUATION

We provided a draft of this report to NCQAC for review and comment. The Executive Director of the Nursing Care Quality Assurance Commission (NCQAC) and the Director, Office of Financial Management submitted a written response.

In their response, the NCQAC reported that Washington State decided to join the Nurse Licensure Compact (NLC) in April 2023, with the law taking effect on July 23, 2023. This action triggered an update to the audit report as required by the Generally Accepted Government Auditing Standards. We removed one recommendation from the audit report because joining the NLC satisfies the recommended action. We also needed to update six of the audit's other recommendations (1, 2, 3, 5, 7, 9) to distinguish between applicants for a license to practice only within Washington State and the NCQAC's forthcoming issuance of the NLC's multistate license that allows practice in member states. Finally, we needed to update the section of the report that prospectively analyzes the potential impacts and risks of NLC membership on the NCQAC's licensing process to reflect the State's decision to join the NLC.

The NCQAC disagreed with one recommendation (4), related to the requirement for nurses who completed 1,000 hours of clinical experience within Washington State. The intent of this recommendation is to address a gap in the licensing requirements resulting from the COVID-19 state of emergency without undermining the existing licensing rule.

APPENDIX E: AGENCY RESPONSE



STATE OF WASHINGTON

May 11, 2023

Ms. Denise Callahan, President
TAP International, Inc.
333 University Avenue, Suite 200
Sacramento, CA 95825

Dear Ms. Callahan:

Thank you for the opportunity to review and respond to TAP International, Inc.'s performance audit report on *"Nursing Care Quality Assurance Commission — Opportunities are Present to Support Efforts by the Commission to Speed Licensing."*

We appreciate the work of the performance audit team to provide NCQAC with recommendations on how to improve the licensing process for out-of-state nurses. We face a national nursing shortage, and the COVID-19 pandemic created additional challenges in keeping up with workforce demands. We recognize the value and need for continued process improvements and legislative action to address these challenges.

We are pleased that one of TAP's recommendations was for NCQAC to continue issuing Temporary Practice Permits (TPPs) for applicants, pending receipt of federal fingerprint background checks. TPPs allow nurses to work at their full scope of practice while their application for a permanent license is pending. NCQAC provides weekly reports to the Office of the Governor on the timeliness of issuing out-of-state TPPs, which includes all steps of the licensing process except for the fingerprinting requirement. The performance goal for reviewing and issuing a complete application is under seven days and was established by the Legislature in the 2021-23 biennial budget.

Several other recommendations align well with Substitute Senate Bill 5499, the Multistate Nurse Licensure Compact, which was approved by the 2023 Legislature and takes effect on July 23, 2023. The Nurse Licensure Compact enables nurses who already hold a multistate license in a participating U.S. jurisdiction to practice immediately in Washington state. Implementation of the Healthcare Enforcement and Licensing Modernization Solution (HELMS) in April 2024 also will streamline licensing processes and greatly reduce manual data entry.

Again, thank you for your collaboration during this audit. We look forward to engaging with our partners, including the Department of Health, as we implement many of the recommendations.

Sincerely,

Handwritten signature of Paula R. Meyer in black ink.

Paula R. Meyer
Executive Director
Nursing Care Quality Assurance Commission

Handwritten signature of David Schumacher in black ink.

David Schumacher
Director
Office of Financial Management

cc: Honorable Pat McCarthy, Washington State Auditor
Jamila Thomas, Chief of Staff, Office of the Governor
Kelly Wicker, Deputy Chief of Staff, Office of the Governor
Nick Streuli, Executive Director of Policy and Outreach, Office of the Governor
Emily Beck, Deputy Director, Office of Financial Management
Mandeep Kaundal, Director, Results Washington, Office of the Governor
Tammy Firkins, Performance Audit Liaison, Results Washington, Office of the Governor
Scott Frank, Director of Performance Audit, Office of the Washington State Auditor

OFFICIAL STATE CABINET AGENCY RESPONSE TO THE PERFORMANCE AUDIT ON NURSING CARE QUALITY
ASSURANCE COMMISSION – OPPORTUNITIES ARE PRESENT TO SUPPORT EFFORTS BY THE COMMISSION TO
SPEED LICENSING – MAY 11, 2023

The Nursing Care Quality Assurance Commission (NCQAC) and the Office of Financial Management (OFM) provide this management response to TAP International, Inc.'s performance audit report received on April 12, 2023.

PERFORMANCE AUDIT OBJECTIVES

The Washington State Legislature requested the State Auditor's Office to conduct a performance audit of NCQAC's licensing process. The State Auditor's Office contracted with TAP International, Inc. in 2022 to address these performance audit objectives:

1. How long does NCQAC take to process permanent licenses for out-of-state applicants?
 2. What factors, if any, contribute to possible delays in the out-of-state licensing process?
 3. What could NCQAC do to improve licensing processes for out-of-state applicants?
-

Recommendations to the NCQAC in brief: TAP International makes ten recommendations to speed licensing and keep pace with application growth.

Recommendations 1-4 ask NCQAC to work, when necessary, with the Washington State Legislature to update existing licensing requirements and promote the state's intent to protect public safety.

1. Modify requirements for FBI background checks, allowing NCQAC greater flexibility, such as allowing background check exemptions if the applicant can demonstrate a recently completed FBI background check.

STATE RESPONSE: [Substitute Senate Bill 5499](#), the Multistate Nurse Licensure Compact, was passed by the 2023 Legislature and recently signed by the governor. It takes effect on July 23, 2023. The compact requires FBI criminal background checks on all applicants for multistate licenses.

[RCW 18.130.064](#) directs the Secretary of the Department of Health in the collection of criminal background checks on applicants. NCQAC welcomes the opportunity to work with the Secretary of Health and all health professions on the requirements for criminal background checks.

Action Steps and Time Frame

- Develop the Nurse Licensure Compact implementation plan, including FBI criminal background checks on all applicants. *By December 31, 2024.*
 - Explore amending RCW 18.130.064 with the Health Systems Quality Assurance to improve the collection of FBI criminal background checks. *By September 30, 2023.*
-

2. Eliminate the requirement for transcripts from NCQAC-approved, nationally accredited nursing schools and allow NCQAC the discretion to request transcripts when needed.

STATE RESPONSE: We disagree with this recommendation for safety reasons. [RCW 18.79.160](#) requires transcripts for licensure.

Eliminating the requirement to verify graduation from an approved nursing education program with official

transcripts adds risk to the public and NCQAC. For example, a nurse who did not complete a legitimate nursing education program could be inadvertently licensed if we do not verify education.

We already have adjudication of fraudulent schools of nursing from Florida underway. NCQAC is working with the FBI and other boards of nursing to address over 7,600 nursing licenses, known as Operation Nightingale. In Washington, 150 nurses were identified as graduating from the Florida schools of nursing associated with Operation Nightingale. To date, NCQAC has rescinded 24 RN licenses and denied 15 applications from nurses associated with Operation Nightingale.

Additionally, a school may be accredited without an individual student completing the entire nursing education program. Review of official transcripts verifies that the individual attended and completed the approved program. Evaluation of course content and program completion also are critical actions to ensure Washington state nursing education requirements are met and the public is protected.

Action Steps and Time Frame: N/A

3. Update the license application to collect the applicant's state of residency, physical and mailing address, and modify the criteria to initiate an FBI background check based on the risk to public safety.

STATE RESPONSE: The governor recently signed SSB 5499, the Multistate Nurse Licensure Compact. NCQAC will develop an implementation plan that includes enacting the rules requiring FBI criminal background checks on all applicants for a multistate license, no later than December 31, 2024. Currently, 39 U.S. jurisdictions are members of the Nurse Licensure Compact. Multistate licensees must have an FBI criminal background check to hold a multistate license. The National Council of State Boards of Nursing (NCSBN) is striving to have the Nurse Licensure Compact be the standard for all states, rather than the single state and multistate methods that exist now.

Action Steps and Time Frame

- Explore amending RCW 18.130.064 with the Health Systems Quality Assurance to improve the collection of FBI criminal background checks. *By September 30, 2023.*
 - Explore updating the license application to capture additional applicant information up front. *By September 30, 2023.*
-

4. Update the WAC to allow out-of-state applicants from non-traditional nursing schools to be eligible for licensure upon completing 1,000 hours of clinical experience within Washington State.

STATE RESPONSE: NCQAC disagrees with this recommendation. [WAC 246-840-048](#) was adopted because the method of education and testing used by the Excelsior College nursing program in New York did not meet Washington state standards. This program did not provide clinical experiences for its students, and it tested students on a weekend at testing centers located in a few cities in the United States.

NCQAC did significant research and sought stakeholder input in preparing the new rule. WAC 246-840-048 requires an individual who did not complete our state's licensing requirements by July 27, 2020, to complete 1,000 hours of nursing practice in another state in order to become endorsed in Washington state. Allowing these individuals to obtain their 1,000 hours of clinical practice in Washington state prior to licensure would constitute practicing without a license, in violation of [RCW 18.79.030](#). The only individuals who completed 1,000 hours of clinical practice in Washington state without a license would have been practicing under the authority of [Chapter 70.15 RCW](#) and a declared state of emergency.

Action Steps and Time Frame: N/A

Recommendation 5 addresses performance monitoring.

5. Establish goals and compute a measure(s) that provides for other assessments of licensing timeliness and performance. Options to consider include:
 - a. Establish goals and compute measures for overall and specific timeliness across applications measuring the actual application processing time, including out-of-state applications, from application receipt to license issuance.
 - b. Establish goals and compute measures capturing the application process to provide quantitative data on timeliness or delays, which NCQAC does and does not control, to pinpoint areas for improvement and increased timeliness. These measures should individually capture the timeliness of the intake, background, and educational review processes.
 - c. Develop and administer a customer satisfaction survey to gauge customer experiences with licensing timeliness.

STATE RESPONSE: NCQAC welcomes the opportunity to develop and implement meaningful performance measures for licensing processes.

[RCW 18.79.390\(5\)](#) requires NCQAC and the Department of Health to develop performance measures. Prior to the pandemic, NCQAC used a robust system of performance measures, including licensing measures. NCQAC and DOH are revising their joint operating agreement that includes developing meaningful performance measures. Implementation of the Health Enforcement and Licensing Management (HELMS) database in April 2024 may enhance this data collection.

Additionally, implementation of the Nurse Licensure Compact will include data collection and research to evaluate the licensing and disciplinary outcomes.

Action Steps and Time Frame

- Negotiate and sign the joint operating agreement at the July NCQAC meeting. *By July 31, 2023.*
- Work with HSQA to develop meaningful performance measures. *By January 31, 2024.*
- Share outcomes and best practices to measure performance outcomes with DOH and publicly display them on the NCQAC website. *By February 28, 2024.*

Recommendations 6-7 address hastening the licensing process until the new licensing information system is fully implemented.

-
6. Purchase and implement automated technologies like artificial intelligence bots to scan and extract relevant application information versus manually entering licensing applications into ILRS.

STATE RESPONSE: NCQAC agrees that the use of new technologies should be explored but disagrees with this recommendation since NCQAC and DOH are in the process of implementing a new technology, HELMS. To purchase, program, implement and then interface with another system at this time may be counterproductive and time-consuming for staff who will be testing and implementing the HELMS system. Implementation of HELMS should include process efficiencies, automations, and advanced technologies, which will significantly reduce the need for manual data entry. The implementation date of HELMS is slated for April 2024.

Action Steps and Time Frame: N/A

7. Continue to issue temporary practice permits for applicants, pending receipt of results of federal background checks.

STATE RESPONSE: NCQAC agrees with this recommendation and the continued performance measures reporting.

Action Steps and Time Frame

- NCQAC will revise [WAC 246-840-095](#) with reasonable deadlines for the collection of FBI fingerprints and issue temporary practice permits. *By December 31, 2023.*
-

Recommendations 8-10 address scalability of the licensing process.

8. Establish a pilot program to expedite the endorsement application process by incorporating a risk-based approach to licensing that considers the following options: (1) Establish reciprocal licensing agreements with states with similar licensing requirements as NCQAC to allow for an expedited licensing review for nurses already licensed in those states, or (2) Monitor licensees for complaints and discipline and use advanced analytics to identify common factors – such as nursing school or type of license—among the licensed professionals with no or low levels of complaints or discipline, and allow for immediate Temporary Practice Permit (TPP) issuance upon application receipt for these lowest-risk groups.

STATE RESPONSE: The governor recently signed SSB 5499, the Multistate Nurse Licensure Compact, which creates the ability for nurses who already hold a multistate license in one of the other participating 39 U.S. jurisdictions to practice immediately in Washington state. We will develop an implementation plan that includes enacting rules that require FBI criminal background checks on all applicants for a multistate license no later than December 31, 2024.

Action Steps and Time Frame:

- Implement the Nurse Licensure Compact requiring Washington to be a member of the Compact Administrators Commission. The commission collects data and research associated with the compact. NCQAC will adopt rules to fully implement the compact. *By December 31, 2025.*
 - Fully implement HELMS to aid with data collection and analysis. *By December 31, 2024.*
-

9. Modify the licensing process to minimize the number of touches by different staff by adopting an alternative staffing strategy, which includes expanding the areas that individual staff can review.

STATE RESPONSE: NCQAC will consider this recommendation. The current process of intake, review and approval by all health professions was adopted due to an audit finding in the 1990s. With HELMS, the intake, review, and approval processes are required. A pilot project to investigate alternative processes may discover effective methods to further protect against unqualified applicants and increase efficiency.

The Health Systems Quality Assurance (HSQA) is currently working on a credentialing process that may identify efficiencies. HSQA and NCQAC will work together to apply any lessons learned from the credentialing process.

Action Steps and Time Frame

- Consider the findings of the HSQA credentialing process review and explore recommendations for efficiencies gained and process improvements. *By December 31, 2024.*

- Explore systems used by other state boards of nursing. *By December 31, 2024.*
 - Explore systems used by other licensing agencies in the state of Washington. *By December 31, 2024.*
 - Work with the Council of Enforcement and Licensing (CLEAR) and Federated Associations of Regulatory Boards (FARB) to gather information on licensing processes. *By December 31, 2024.*
 - Compare outcomes of all four data collections and identify similarities and differences and present the findings to the Department of Health. *By July 1, 2026.*
-

10. Dedicate staff to process specific types of licensing applications versus assigning staff based on exam, endorsement, or international.

STATE RESPONSE: NCQAC disagrees with this recommendation until the outcomes of the action steps in Recommendation 9 are complete. The data collection and analysis described in Recommendation 9 will provide evidence to inform changes.

Action Steps and Time Frame: Deferred until after the actions are complete for Recommendation 9.

APPENDIX F: CONTACTS AND ACKNOWLEDGEMENTS

TAP International contact:

Denise Callahan, Denise@tapinternational.org or 916.549.0831

Acknowledgments:

TAP International would like to thank Commission members, management and staff at the Nursing Care Quality Assurance Commission, nursing professional representatives and associations as well as licensing officials in other states that participated in this review.



TAP INTERNATIONAL, INC.
TRAINING ANALYTICS PERFORMANCE