Provider Licensing and Credentialing and COVID-19

UPDATED APRIL 13, 2020 (NEW INFORMATION IN BOLD)

In light of the COVID-19 pandemic and the accompanying emergency declarations, a number of flexibilities related to professional licensing and credentialing have been provided by various federal, state and third-party licensing and accreditation authorities.

Physicians (MDs/DOs):

- **Lapsed or Expired Licenses**: A physician whose Iowa medical license lapsed or expired in good standing within five (5) years of the date of the Governor’s Proclamation may provide medical care and treatment of victims of this public health emergency for the duration of the Proclamation.

- **Initial Licensure for Physicians with Licensure in Another State**: A physician may practice medicine/telemedicine in Iowa without an Iowa medical license on a temporary basis to aid in the emergency, if a physician holds at least one active medical license in another United State jurisdiction, and all medical licenses held by a physician in other United States jurisdictions are in good standing, without restrictions or conditions.

- **Telemedicine and Telehealth Services**: All rules which establish preconditions, limitations, or restrictions on the provision of telehealth or telemedicine services in Iowa are temporarily suspended. All rules which require face-to-face interactions with health care providers, and impose requirements for residential and outpatient substance use disorder treatment and for face-to-face visitations, are temporarily suspended.

- **Medical School Graduates**: An individual who has graduated from an accredited medical school but has not obtained an initial Iowa medical license may seek an emergency medical license from the Board of Medicine. The Board of Medicine may grant an emergency medical license if it determines that the individual has completed sufficient education. If a medical school graduate would like to apply for an Emergency Medical License they should go to the Iowa Board of Medicine’s website and use the Resident license application and indicate that they are applying for an Emergency Medical License. An individual who has been granted an Emergency Medical License shall practice in accordance with any guidance provided by the Board of Medicine.

- **CME Requirements**: All requirements for in-person continuing medical education and all deadlines and other requirements for continuing medical education that are unable to be satisfied due to the health emergency, are temporarily suspended during the period of this health emergency. If a licensee is unable to complete the required continuing medical education required for renewal of their Iowa medical license due to the health emergency, they should note that on their next renewal application.
• **License Renewal Requirements**: All license renewal requirements and deadlines are temporarily suspended during the period of this health emergency. If a licensee had an active Iowa medical license on March 22, 2020, the expiration date will be automatically extended for the duration of this health emergency.

• **Criminal Background Checks**: All criminal background checks required for initial licensure are temporarily suspended during the period of this health emergency due to a temporary lack of fingerprinting services due to potential exposure to COVID-19.

• **In-Person Notarization**: All requirements for in-person notarizations for licensure and other purposes are temporarily suspended during the period of this health emergency due to potential exposure to COVID-19.

**Nurses (Including ARNPs):**

• **Lapsed or Expired Licenses**: A nurse whose Iowa nursing license lapsed or expired in good standing within five (5) years of the date of the Governor’s Proclamation may provide care and treatment of victims of this public health emergency for the duration of the Proclamation.

• **Initial Licensure for Nurses with Licensure in Another State**: A nurse may practice nursing in Iowa without an Iowa nursing license on a temporary basis to aid in the emergency, if the nurse holds an active nursing license in another United States jurisdiction.

• **Initial Licensure**: The Board has the authority to issue emergency licenses to nurses who have not yet obtained initial licensure in Iowa, so long as the nurses have completed sufficient minimum education as determined by the Board. At this time, Board staff is working diligently to create internal processes to implement this provision and will provide guidance in the near future.

• **Telehealth Services**: All rules which establish preconditions, limitations, or restrictions on the provision of telehealth or telemedicine services in Iowa are temporarily suspended. All rules which require face-to-face interactions with health care providers, and impose requirements for residential and outpatient substance use disorder treatment and for face-to-face visitations, are temporarily suspended.

• **NCLEX Examination**: Governor Reynolds temporarily suspended the requirement of rule 655-3.4(4), which required nursing applicants to take NCLEX examination within ninety-one (91) days of receiving Board authorization to test. This is not a suspension of the requirement to pass the NCLEX examination prior to obtaining licensure, but rather extends the time period beyond ninety-one (91) days to take the examination in light of testing centers closing and diminished opportunities to take the exam.

• **CEU Requirements**: A nurse whose license expires during the Proclamation period has sixty (60) days from the end of the Proclamation to apply for renewal without incurring any late penalties. However, the Board of Nursing is operational at this time and will continue to process renewal applications as they are received. Accordingly, nurses may still apply to renew their licenses during this period. In light of the reduced opportunities to obtain continuing education during this public health emergency, nurses whose licenses expire during the Proclamation period, and who apply to renew their licenses during this period, will
not be required to submit proof of completion of continuing education. The suspension of continuing education requirements is only for the duration of the Proclamation. Nurses whose licenses are due for renewal after the termination of the Proclamation will still be required to complete their continuing education requirements. Nurses who may experience undue hardship if required to comply with the continuing education requirements after the end of Proclamation period should contact the Board for assistance.

- **License Renewal Requirements:** A nurse whose license expires during the duration of the Proclamation may continue to work on the expired license. Nurses whose licenses expire during the Proclamation period (currently set to expire April 30) and who do not renew during that period must submit their renewal applications within sixty (60) days of the expiration or termination of the Proclamation. Submission of a renewal application within sixty (60) days will be considered timely and will not result in the assessment of any late fees. Nurses whose licenses are due for renewal after the termination of the Proclamation will still be required to submit their renewal materials pursuant to Board of Nursing rules. Nurses who may experience undue hardship if required to comply with these terms after the end of Proclamation period should contact the Board of Nursing for assistance.

- **Simulation and Clinical Hours:** Governor Reynolds temporarily suspended the requirement of rule 655-2.10(7)(a), which mandated that a simulation component not exceed 50% of total clinical hours in a nursing education course. Accordingly, nursing programs whose students have remaining clinical hours that cannot be completed within a facility due to a COVID19 related hardship may complete the remaining hours using simulation activities, even if the simulation activities exceed 50% of the total clinical hours of the course. The Board strongly encourages programs to provide additional clinical opportunities for nongraduating students in the future to compensate for this period of increased virtual learning. The suspension of this rule is effective through April 30, 2020, unless the Governor terminates or extends the Proclamation.

- **Criminal Background Checks:** Applications for licensure submitted without fingerprint cards will be processed for the duration of the Proclamation. Applicants must still answer all questions on the application and provide any required information relating to their criminal histories. Licenses processed without a fingerprint card will be designated as single-state licenses. The license will not provide the licensee the privilege to practice in another state that is a party to the Nurse Licensure Compact. A licensee whose background check was deferred due to the Governor's Proclamation must return the completed fingerprint packet to the Board within sixty (60) days of the expiration or termination of the Proclamation. Failure to timely return the packet may result in the board rescinding the license.

- **In-Person Notarization:** All requirements for in-person notarizations for licensure and other purposes are temporary suspended during the period of this health emergency due to potential exposure to COVID-19.
Physician Assistants

- **Lapsed or Expired Licenses:** A Physician Assistant whose Iowa physician assistant's license lapsed or expired in good standing within five (5) years of the date of the Governor's Proclamation may provide medical care and treatment of victims of this public health emergency for the duration of the Proclamation.

- **Initial Licensure for Physician Assistants with Licensure in Another State:** A Physician Assistant licensed in another state may apply for an Iowa license by filing an application for licensure by endorsement. Applications may be found on the Board's website.

- **Telemedicine and Telehealth Services:** All rules which establish preconditions, limitations, or restrictions on the provision of telehealth or telemedicine services in Iowa are temporarily suspended. All rules which require face-to-face interactions with health care providers, and impose requirements for residential and outpatient substance use disorder treatment and for face-to-face visitations, are temporarily suspended.

- **Physician Assistant School Graduates or Spring 2020 Graduates:** The Board’s administrative rules permit graduates of approved programs for the education of physician assistants who have not yet taken the NCCPA certification examination to receive temporary licenses. Board rule 645-326.3 establishes a procedure for applying for a temporary license while awaiting the opportunity to sit for the NCCPA examination. PA students who will graduate in the spring of 2020, or students who have already graduated and have not been able to take the NCCPA examination, are strongly encouraged to submit applications for temporary licensure pursuant to rule 326.3. Applications can be found on the Board’s website, and Board staff will make every effort to expedite review of new applications for temporary PA licenses.

- **Supervision:** Licenses will be processed even with no designation of a supervising physician; the Board will not seek confirmation of supervising physician information until after the end of the emergency.

- **Continuing Education Requirements:** All requirements for in-person continuing education and all deadlines and other requirements for continuing education that are unable to be satisfied due to the health emergency, are temporarily suspended during the period of this health emergency.

- **License Renewal Requirements:** Because Physician Assistant licenses do not expire until the end of September 2020 for each licensee's biennium and the current Proclamation is set to expire April 30, it is not anticipated licensure renewals will be impacted.

- **Criminal Background Checks:** All criminal background checks required for initial licensure are temporarily suspended during the period of this health emergency due to a temporary lack of fingerprinting services due to potential exposure to COVID-19.
• **In-Person Notarization:** All requirements for in-person notarizations for licensure and other purposes are temporary suspended during the period of this health emergency due to potential exposure to COVID-19.

**Pharmacists and Technicians:**

• **Lapsed or Expired Licenses:** A pharmacist whose Iowa pharmacy license lapsed or expired in good standing within five (5) years of the date of the Governor’s Proclamation may provide pharmacy services and treatment of victims of this public health emergency for the duration of the Proclamation.

• **Pharmacy Technician Trainees:** The Governor’s action temporarily suspends the rules relating to a technician trainee whose registration is expiring during an extended period (March 22 through May 31) to allow the technician trainee to continue to practice as a technician while their registration is expired and the technician is unable to obtain national certification due to the closure of testing locations. A technician trainee who continues to work pursuant to this authorization does not need to contact the Board of Pharmacy.

• **Continuing Education Requirements:** For a pharmacist whose license is current and active and due to renew in 2020: Pharmacist licenses must be renewed prior to July 1. At this time, the Governor’s Proclamation is set to expire on April 30. Accordingly, the Board of Pharmacy does not anticipate the continuing education requirements will be impacted by this public disaster. The Board will continue to monitor the situation and provide additional guidance should the disaster be extended beyond April 30.

• **License Renewal Requirements:** The suspension applies to licenses and registrations which expire between March 22 and April 30 only. The Board of Pharmacy is operational at this time and licensing staff is continuing to process license and registration renewals. The Board has no expectation at this time that applications will not be processed as normal. Licensees and registrants are encouraged to utilize the Board’s online renewal process. **Licensees or registrants whose license or registration expires during the emergency period (March 22-April 30) may continue to practice through April 30.** The Board intends to exercise enforcement discretion for licensees who are covered under this Proclamation to allow the licensee or registrant whose license or registration expires March 31 and April 30 to obtain renewal of their license or registration and will not incur a late penalty fee if renewed not later than May 31.

• **Criminal Background Checks:**
  
  o For Iowa-licensed pharmacist-interns completing their experiential program and anticipating to initiate the licensure process following graduation: Currently, the proclamation is set to expire on April 30 and therefore this suspended background check requirement may not apply to current students. In the event the proclamation is extended, the Board will issue further guidance.

  o For pharmacists seeking licensure in Iowa via license transfer: Applications for license transfer will be processed for the duration of the public health disaster emergency, temporarily deferring the completion of the background check. Upon the
termination of the public health disaster emergency, Board staff will supply fingerprint packets to those who must still undergo a criminal history background check. A licensee whose background check was deferred due to the Governor’s Proclamation must return the completed fingerprint packet to the Board within 60 days of the expiration of the Proclamation. Failure to timely return the packet may result in license rescission.

- For facility managers of third-party logistics providers and wholesale distributors, and supervising pharmacists of outsourcing facilities: Applications for licensure will be processed for the duration of the public health disaster emergency, temporarily deferring the completion of the background check. Upon termination of the public health disaster emergency, Board staff will supply fingerprint cards to those facility managers who must still undergo a criminal history background check. A facility manager whose background check was deferred due to the Governor’s Proclamation must return the completed fingerprint packet to the Board within 60 days of the expiration of the Proclamation. Failure to timely return the packet may result in license rescission.

- **Requirements Related to Licensure Examinations:** Governor Reynolds temporarily suspended the rule that requires a pharmacist licensure candidate to complete both licensure examinations within one year of the candidate passing one examination. If a candidate has previously passed one examination (NAPLEX or MPJE-Iowa Edition) and, due to the closure of testing locations, is unable to sit for the second examination and the candidate is nearing the expiration of the original one-year deadline to complete the second examination, the one-year deadline is waived for the period of the Proclamation (currently through April 30). The Board will continue to monitor and may exercise enforcement discretion following the expiration of the Proclamation period as warranted.

- **In-Person Notarization:** All requirements for in-person notarizations for licensure and other purposes are temporary suspended during the period of this health emergency due to potential exposure to COVID-19.

**Respiratory Therapy**

- **Lapsed or Expired Licenses:** For a license that is currently inactive, you may return to practice without reactivating your inactive license if it has not been expired for more than 5 years. If your license has been expired for more than 5 years, you will need to complete the reactivation process before returning to practice.

- **Initial Licensure:** The Board has determined that current students and graduates of respiratory care programs may qualify for an emergency license. Graduates will need to verify completion of a respiratory care program. Current students will need an attestation from their respiratory care program that they are competent to perform entry level respiratory care services. An emergency license will allow an individual to practice respiratory care for the duration of the Proclamation only. Emergency licensees are authorized to provide basic, entry level services, in an effort to free up more experienced licensees to assist in critical
care situations. Emergency licensees should only be assigned procedures that the employer feels the emergency licensee can safely perform based on their education.

- **Continuing Education Requirements/License Renewal**: Due to continuing education course cancellations, the Board is waiving all requirements for continuing education for this license renewal. In order to complete the renewal application, you will need to attest that you have completed the required continuing education. You should attest to the completion of the hours even if you have not completed the hours—this will not be held against you. You are encouraged to take any continuing education necessary to remain competent to practice in your profession. You are not required to renew your license for the duration of the Proclamation. You will have 60 days after the Proclamation expires to renew your license without penalty.

- **Criminal Background Checks**: If you apply for a license that requires a background check, your application will be processed prior to performing the background check for the duration of the Proclamation. You will still be sent a fingerprint packet after you submit your application, but you do not need to return the completed fingerprint packet until after the expiration of the Proclamation. You will have 60 days after the Proclamation expires to return your completed fingerprint packet to the Board office.

- **In-Person Notarization**: All requirements for in-person notarizations for licensure and other purposes are temporary suspended during the period of this health emergency due to potential exposure to COVID-19.

**Social Workers**:

- **Social Workers with Licensure in Another State**: A social worker licensed in another state, whose license is in good standing, may provide services to Iowans through electronic means without obtaining an Iowa license.

- **Continuing Education Requirements**: This Board already allows licensees to obtain all continuing education requirements online. Licensees will still be required to obtain the requisite number of hours of education as license renewals are not due until the end of December, 2020.

- **Supervision**: Licensees who begin their period of supervised professional practice for licensure at the independent level while the Proclamation is in effect are not required to have their first supervision meeting in person, and pursuant to existing Board rules, may have their remaining supervision meetings via electronic means.

- **License Renewal Requirements**: Because social worker licenses do not expire until the end of December 2020 and the current Proclamation is set to expire April 30, it is not anticipated licensure renewals will be impacted.

**Physical and Occupational Therapists**:
License Renewal Requirements: If a licensee’s license is scheduled to expire while the Proclamation is in effect (currently April 30, 2020), the licensee will have a period of 60 days after the Proclamation expires (currently April 30, 2020) to renew the license.

Continuing Education: All rules that require completion of any in-person education are waived for the next license renewal, regardless of when the licensee’s license expires.

Criminal Background Checks: If you apply for a license that requires a background check, your application will be processed prior to performing the background check for the duration of the Proclamation. You will still be sent a fingerprint packet after you submit your application, but you do not need to return the completed fingerprint packet until after the expiration of the Proclamation. You will have 60 days after the Proclamation expires to return your completed fingerprint packet to the Board office. Physical Therapists and Physical Therapist Assistants only—Note that you will not be eligible for PT Compact privileges as an Iowa licensee until the background check is completed.

Hospital Privileges:


- CMS has also granted a waiver request that allows providers whose privileges will expire to continue practicing at the hospital or CAH and for new providers to be able to practice in the hospital or CAH before full medical staff/governing body review and approval.

IPERS:

The Governor’s Proclamation on March 26 suspended the provisions of IPERS to the extent those provisions require reduction or repayment of a member’s retirement allowance if the member is reemployed or returns to the employment during the pendency of this disaster as a licensed health care professional employed by a hospital licensed under Iowa Code Chapter 135B, any state or local government public health employee, any protection occupation as defined by Iowa Code Section 97B.49B(1)(e), or any sheriff or deputy sheriff as defined by Iowa Code Section 97B.49C(1)(b) or (c).