

# EXPEDITED LICENSING PATHWAYS AVAILABLE FOR HEALTH CARE WORKERS IN RESPONSE TO COVID-19

The Missouri Hospital Association advocated with various state agencies and elected officials for expedited pathways to allow health care workers to provide services to patients in Missouri. The governor invoked the provisions of Sections 44.100 and 44.110, RSMo, declaring a state of emergency related to the spread of COVID-19. [Executive Order 20-04](#) was subsequently issued where the governor granted departments, including the Department of Commerce and Insurance, and the Division of Professional Registration and its boards the authority to temporarily waive or suspend any statutory requirement or administrative rule or regulation under the director’s purview, upon approval of the Governor’s Office. Please consult the relevant state agency with questions about processes and specific applications. Executive Order 20-12 has extended the below waivers. Individual boards have the ability to suspend waivers as deemed appropriate.

Practitioner Type	Licensing Pathway	Requirements & Process	Estimated Time to Receive Approval	Effective Period
Broad applicability to licensed health care workers, including RN, ARNP, PA, MD, etc. Additional <a href="#">waiver information</a> can be found on the Division of Professional Registration website.		The waivers listed on the Division of Professional Registration site sometimes reference entire regulations. This may be misleading as each of the Divisions made specific requests within statute and/or regulation. It is unlikely an entire statute or regulation has been waived. Check the specific board’s website for further clarification.		
	<a href="#">190.500</a> . Temporary license	A temporary license may be issued for no more than a twelve-month period by the appropriate licensing board to any otherwise qualified health care professional licensed and in good standing in another state and who meets such other requirements as the licensing board may prescribe by rule and regulation, if the health care professional: (1) Is acting pursuant to federal military orders under Title X for active duty personnel or Title XXXII for National Guard members; and (2) Is enrolled in an accredited training program for trauma treatment and disaster response in a hospital in this state; or by any available means, including electronic mail.		
	<a href="#">190.500</a> . Temporary license cont.	(3) If the health care professional is acting pursuant to the governor’s declaration of an emergency as defined in section <a href="#">44.010</a> , such temporary licensure shall be issued pursuant to this subdivision for a two-week period and, upon license verification, may be reissued every two weeks thereafter. 2. Licensure information and confirmation of health care professionals acting pursuant to this section may be obtained 3. For purposes of this section, the term “health care professional” shall have the same meaning as such term is defined in section <a href="#">383.130</a>		
	<a href="#">324.009</a> . Licensure reciprocity	Any resident of Missouri who holds a valid current license issued by another state, territory of the United States, or the District of Columbia may submit an application for a license in Missouri in the same occupation or profession for which he or she holds the current license, along with proof of current licensure in the other jurisdiction, to the relevant oversight body in this state.		

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<p><a href="#">Missouri State Board of Nursing</a> APRN, RN, LPN</p> <p>Email. Limit phone calls. Employers: email Lori Scheidt, <a href="mailto:lori.scheidt@pr.mo.gov">lori.scheidt@pr.mo.gov</a></p> <p>All others can use the generic email address of <a href="mailto:nursing@pr.mo.gov">nursing@pr.mo.gov</a></p>	Employers wishing to speak with the MSBON about expedited licensure should email Lori Scheidt, <a href="mailto:lori.scheidt@pr.mo.gov">lori.scheidt@pr.mo.gov</a> . The temporary practice permit is the path to licensure in MO.	<p>If you need expedited application processing due to an urgent staffing need, please complete the expedited licensure form and submit it along with the application. <a href="#">License Information and Forms</a></p> <p><a href="#">NCLEX testing related to COVID-19</a></p> <p>Updates will be posted at <a href="https://pr.mo.gov/nursing-covid-19.asp">https://pr.mo.gov/nursing-covid-19.asp</a></p>	<p>Could be completed in as soon as 2-3 days.</p> <p>Remains in effect until determined by the board no longer needed.</p>	
	CSR 2200-4.200(2)(B)(2)	Waives the 75 mile geographic proximity rule for APRN in a Collaborative Practice Agreement. The APRN and Physician could practice greater than 75 miles apart.	Immediate	3/26/20-12/30/20
	334.104.3(9), RSMo, and 20 CSR 2200-4.200(4)(E)	Waived until after the declared emergency is over the requirement that the collaborating physician or any other physician designated in the collaborative practice arrangement review the advanced practice registered nurse's delivery of health care services through a review of a minimum of ten percent of the charts every fourteen (14) days. This waiver does not include the review of the percentage of cases where the advanced practice registered nurse prescribed controlled substances.		4/2/20-12/30/20
	334.104.9, RSMo, and 20 CSR 2200-4.200(2)(C)	Waived for the requirement that the advanced practice registered nurse practice with the collaborating physician continuously present for at least a one-month period of time before practicing in a setting where the collaborating physician is not continuously present.	APRN allowed to practice in Missouri will be able to establish a collaborative practice agreement and begin working to the fullest extent of their scope of practice before the current 30-day minimum time limit.	4/2/20-12/30/20
	20 CSR 2200-4.020(3)(H)	Waives applicant from having to have a copy of their transcript/marksheet.		12/30/20
	335.081(6) (b) 20 CSR 2200-4.020(1) (G), RSMo, allows graduate nurse to practice after graduation pending results of first licensing exam or 90 days after graduation	<p>The licensing exam all graduate nurses take for a license is the National Council Licensure Exam (NCLEX®). The NCLEX® is administered in Pearson Vue test centers. All Pearson Vue test centers closed March 17, 2020, and are expected to be closed through at least April 16, 2020.</p> <p>State Statute 335.081 (6)(b), RSMo allows a graduate nurse to practice after graduation pending the results of their first licensing exam or 90 days after graduation, whichever first occurs.</p> <p>The Board of Nursing has extended the graduate exempted practice period an additional 90 days for each nurse that will be taking the exam for the first-time and whose graduate exempted practice period expired or will expire during the period of time that Pearson Vue is not administering the NCLEX® exam.</p> <p>Anyone who graduated on or after December 16, 2019, has not previously taken the NCLEX® and has not been denied a license is now authorized to practice as a graduate nurse pending the results of their first licensing exam or 180 days after graduation, whichever first occurs.</p>	Remains in effect until determined by the board no longer needed.	3/23/20-until Board determines no longer needed
	20 CSR 2200-4.020(6) indicates, "A temporary permit is valid for a six (6) month period	<p>Rule 20 CSR 2200-4.020(6) indicates, "A temporary permit is valid for a six (6) month period."</p> <p>Fingerprint sites, nursing programs and many boards of nursing are closed or operating on limited hours. The board recognizes this impedes the ability to request background checks, transcripts and license verifications. In order to allow for continued employment, the board will automatically extend any unexpired temporary permit an additional six (6) months. This does not require any action by the nurse. To check the license expiration date of a temporary permit at <a href="http://www.nursys.com">www.nursys.com</a> using <a href="#">QuickConfirm License Verification</a>.</p> <p>A nurse who holds a temporary permit should enroll As a Nurse in Nursys e-Notify at <a href="http://www.nursys.com/enotify">www.nursys.com/enotify</a> in order to receive permit expiration date reminders.</p> <p>Employers should create an institution account at <a href="http://www.nursys.com/">www.nursys.com/</a> <a href="#">enotify and enroll that temporary permit holder in order to receive permit expiration date reminders</a>. New temporary permits will be issued for a one (1) year period.</p>	Remains in effect until board determines no longer needed.	3/23/20-until Board determines no longer needed

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Missouri Board of Pharmacy Pharmacists, Pharmacy Technicians, Intern Pharmacists  <a href="#">Board information</a> on COVID-19  For a complete listing of detailed <a href="#">MBOP waivers</a> related to COVID-19		For expedited requests surrounding licensure or registration with the Missouri Board of Pharmacy, use the <a href="#">Emergency Practice Notification Form</a> .	Immediate upon submission of form.	
	338.013	Pharmacy technicians, during the COVID response for the time period of the waiver issued by the Board of Pharmacy, as soon as technicians submit the Emergency Practice Notification Form, either in email or by mail, may begin to practice as a technician.	Immediate upon submission of form.	3/23/20-12/30/20
	338.020	Pharmacists, during the COVID response for the time period of the waiver issued by the Board of Pharmacy, who are licensed in another state or previously licensed but retired should submit the Emergency Practice Notification Form. As soon as the form is submitted in email or by mail, the pharmacists can begin practicing.	Immediate upon submission of form.	3/23/20-12/30/20
Missouri Board of Healing Arts  Email: <a href="https://pr.mo.gov/healingarts.asp">https://pr.mo.gov/healingarts.asp</a>  Phone: 573-751-0098  For a complete <a href="#">list and explanation of waivers</a> from the Board of Healing Arts		MBOHA will be keeping the office open and have deemed the Licensure Section as essential employees.  The Board amended internal procedures for processing applications to include utilization of online verifications in lieu of waiting for printed verifications to come directly from other state boards; pulling the NPDB reports for applicants if none are on file at the time of application processing; and not holding up licensing if they do not have a proposed business address or a small lapse in time in the activities statement.  <b>Applicants should write COVID across the top of their application to ensure PRIORITY process and approval.</b>  <b>Consult the Board website for additional licensure allowances for Physical Therapists, PT Assistants, and others.</b>	Current licensure process approximately 75 days for physicians.	
	334.104.3 (5)(b) and 20 CSR 2150-5.100(2)(B)	<b>The Board is waiving the 75 mile geographic proximity provision in the statute. This will allow APRN and the collaborating physicians to be located more than 75 miles apart when providing care.</b>		3/26/20-12/30/20
	334.037.2(5)(b), RSMo, 334.037.3(1), RSMo, 20 CSR 2150-2.240(1)(A) and 20 CSR 2150-2.240(1)(B), 334.735.9(5)(b), RSMo 20 CSR 2150-7.135(8)(C)	The Board has approved the temporary waivers that will allow a collaborating physician and physician assistants and/or assistant physicians to practice over seventy-five (75) miles of one another. A physician can collaborate with either of these professionals regardless of where the providers are located.		3/31/20-12/30/20
	334.735.9(5)(b), 9(8) and 13, RSMo	Eliminate the requirement for the collaborating physician or any other physician designated in the collaborative practice arrangement to review the PAs delivery of health care services through a review of a minimum of ten percent (10%) of the charts every fourteen (14) days. This waiver does not include the review of the percentage of cases where the PA prescribed controlled substances		3/31/20-12/30/20
	20 CSR 2150-7.135(7), (8)(c) and (10)	Eliminate the requirement that the PA practice with the collaborating physician continuously present for at least a one (1) month period of time before practicing in a setting where the collaborating physician is not continuously present		3/31/20-12/30/20

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	20 CSR 2150-2.030	Exempts physicians who are licensed in another state from applying for licensure in the state of Missouri if they are coming to Missouri to assist with COVID-19. Physicians that fall under these licensure waivers do not have to make application or notify the Board of their intent to practice in Missouri. They may be required to show proof of licensure in another state to the employers and third party payers.	Immediate	3/31/20-12/30/20
	20 CSR 2150-2.153	Exempts retired and inactive physicians from applying for reinstatement if they wish to return to practice to assist with COVID-19. Physicians that fall under these licensure waivers do not have to make application for reinstatement or notify the Board of their desire to return to practice to assist with COVID-19. They may be required to show proof of Missouri licensure to the employers and third party payers through the Board's online verification system at <a href="https://pr.mo.gov/licensee-search-nonactive.asp">https://pr.mo.gov/licensee-search-nonactive.asp</a>	Immediate	3/25/20-12/30/20
	20 CSR 2150-2.068	Emergency Rule to establish an avenue for temporary licensure of Graduate Medical Students during the state of emergency related to COVID-19	Effective May 15 -November 20	
	334.412 and 334.408 RSMo	The reason for the waiver is to allow licensure of current, inactive or retired AA. The waiver eliminates the application and office procedure for accepting licensed AAs who possess an active license without discipline in any state or territory of the United States or the District of Columbia to practice in the same manner and to the same extent as AAs are authorized to practice in Missouri without having to file an application. This waiver is limited to AAs who are licensed in another jurisdiction without discipline on their license who wish to practice in Missouri during the State of Emergency. Consult the Board website for additional instruction and limitations.		3/31/20-12/30/20

The Division of Professional Licensure and Registration has additional information on waivers that have been requested and approved on their website. The list above is not a comprehensive list of professions or waivers. [Please go to https://pr.mo.gov/](https://pr.mo.gov/) and search under each board for a complete listing.

This resource has been adapted from the Washington State Hospital Association.



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P.O. Box 60 | Jefferson City, MO 65102-0060 | [www.mhanet.com](http://www.mhanet.com)