

**STUDY RE: THE FEASIBILITY AND IMPLICATIONS OF IMPLEMENTING A
BIENNIAL LICENSE RENEWAL SYSTEM FOR NURSES**

*A Report to the Joint Standing Committee Having Cognizance of Matters
Relating to Public Health*

Connecticut State Legislature

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EXECUTIVE SUMMARY

Nursing is the largest profession licensed by the Department of Public Health. As of December 2008, there are over 68,500 nurses who hold active licenses and another 3,275 who hold retired licenses. It is anticipated that nurse license renewal fees will generate approximately \$6.4 million in annual revenue for the general fund in State Fiscal Year 2009.

During the 2008 legislative session, the Connecticut General Assembly enacted Public Act 08-184, which required the Department of Public Health to prepare a report on the feasibility and implications of the implementation of a biennial license renewal system for persons holding a license to practice nursing under Chapter 378 of the General Statutes. The act further mandated that the Department shall submit the report to the joint standing committee having cognizance of matters relating to public health not later than January 1, 2009, (see Appendix A).

For purposes of the report, the Department reviewed various factors. The Department's experience with the implementation of biennial licensing for several professions in 2003 as well as a fee increase for nurses in 2007 provided insight into the activities and costs involved in implementing changes of this magnitude. Current fees and license renewal schedules for nurses in other states were also reviewed. Finally, budget and other implications related to moving from annual to biennial licensing were considered.

While the Department has no specific recommendations concerning whether biennial license renewal should be implemented for nurses, the Department urges the Committee to consider the identified implications. In the event that the General Assembly enacts legislation to implement biennial licensing for nurses, the Department recommends that it not be effective until at least one year after the implementation date for on-line license renewals for nurses.

Should the Public Health Committee decide to move forward with a biennial licensing proposal for nurses, the Department respectfully requests the opportunity to work with the Committee on proposed language to ensure that anticipated implementation issues are addressed, which would allow for an effective and efficient transition from annual to biennial license renewal.

Herein lie the results of the study, which served as the basis for the identified recommendations

FINDINGS

In conducting this study, the Department reviewed various factors:

- the current license renewal process and the Department's experience with the implementation of biennial license renewal for other professions in 2005 and fee increases for nurses in 2007;
- license renewal fees and schedules for nurses in other states; and
- budget and other implications related to changing the renewal schedule.

LICENSE RENEWAL IN CONNECTICUT

With few exceptions, health care practitioner licenses expire on the last day of the practitioner's birth month and are valid for either one or two years. During the June Special Session of the 2003 legislative session, the General Assembly enacted Public Act 03-03, which changed the license renewal period from annual to biennial for several professions and doubled the respective licensing fees (see Appendices B and C). Prior to 2003, the only other health care professions with biennial licensure were occupational therapists and occupational therapy assistants.

License renewal applications are mailed to licensees sixty days in advance of the expiration date. In accordance with Section 19a-88 of the General Statutes, a licensee may renew his or her license up to ninety days past the expiration date, after which time the license becomes void. A second renewal application and final notice is mailed to all licensees who have not renewed their licenses as of their expiration date to notify the license holder that the license will become void if it is not renewed before the expiration of the grace period.

As part of the renewal process, licensees are required to report to the Department if they were convicted of a felony or had any disciplinary action taken against them within the last year, and whether any such actions are pending at the time of renewal with another state's licensing authority. Practitioners are also asked to provide additional workforce related information such as whether they are currently working in their licensed profession and their practice location. Although this information is not currently entered into the licensing system, it is captured and will be automated as part of on-line license renewal system, which is currently under development for physicians, dentists and nurses.

The current licensing database has been designed to accommodate both annual and biennial renewal schedules. Minimal programming changes are necessary when incorporating changes to the renewal schedule. However, careful consideration must be given to the effective dates and implementation dates when contemplating changes in the licensing fee and/or renewal schedule. Adequate lead time is necessary to ensure that database programming changes can be accomplished, application forms can be updated accordingly and sufficient notice can be provided to licensees to ensure that there is no confusion as to the due date or fee amount that must be sent. Additionally, lack of adequate lead time increases costs associated with implementation.

COMPARISON OF LICENSE RENEWAL FEES AND SCHEDULES FOR NURSES IN CONNECTICUT AND OTHER STATES

Connecticut is one of only a few remaining states that require nurses to renew their licenses on an annual basis. The majority of states have implemented biennial license renewal. The fee structure varies widely across the country (see Appendix D). Connecticut's nurses currently pay the following fees associated with license renewal:

Advanced Practice Registered Nurse	\$ 120.00
Licensed Practical Nurse	\$ 60.00
Registered Nurse	\$ 100.00
Retired Advanced Practice Registered Nurse	\$ 6.00
Retired Licensed Practical Nurse	\$ 3.00
Retired Registered Nurse	\$ 5.00

In accordance with Public Act 07-01 of the June 2007 Special Session of the General Assembly (Appendix E), nurse licensure fees doubled to the current fee structure. Prior to enactment of Public Act 07-01, nurse licensure fees in Connecticut had not been raised since 1992.

BUDGET AND OTHER IMPLICATIONS

Potential Loss of Revenue to the General Fund

Pursuant to Section 19a-21 of the General Statutes, all revenue collected by the Department of Public Health in connection with the issuance or renewal of any professional license is deposited into the general fund of the state treasury. Revenue that is generated from licensing fees does not directly support any Department of Public Health activities.

Based on the current fee structure, approximately \$6.4 million in nurse licensing fees is currently deposited into the general fund on an annual basis (Appendix F). Moving from an annual to biennial licensing schedule could significantly impact the revenue stream to the general fund. The significance of the impact would be directly related to the effective date of the change and whether or not the current fees would also change.

Although there are several models to consider in implementing biennial license renewal (see Appendix G), doubling the current license fees and enacting a January 1 implementation date appears to be the only identified scenario that may allow implementation of a biennial license renewal proposal for nurses to be relatively revenue neutral.

Potential Savings to the Department of Public Health

Implementation of biennial license renewal for nurses may result in an annual savings to the Department of up to approximately \$50,000.00 in operating expenses related to printing, postage and supply costs associated with mailing renewal notices and licenses.

No savings in personnel costs are anticipated as there is minimal intervention by the licensing staff in the renewal process. Renewal cards that are not signed, that have an address change noted or require additional follow-up related to a felony conviction or licensure action taken in another state are already flagged. The additional information collected at the time of license renewal is not reviewed or entered into the licensure database as it cannot be absorbed within the Department's existing resources.

Other Implications

As previously referenced, as part of the renewal process, licensees are required to report to the Department if they were convicted of a felony or had any disciplinary action taken against them within the last year, and whether any such actions are pending at the time of renewal with another state's licensing authority. In moving to a biennial license renewal schedule, the Department would only receive such reports every two years rather than annually. Unless the Department was to receive notification of a felony conviction or licensure action taken by another state's licensing authority through a means other than the renewal application, timeliness in the investigation of such incidents may be an issue.

Practitioners are also asked to provide additional workforce related information such as whether they are currently working in their licensed profession and their practice location. Upon implementing on-line license renewals for nurses, the Department intends to incorporate a workforce survey tool to capture valuable data needed to evaluate the state's workforce needs relative to nursing and to comply with Connecticut General Statutes, Section 19a-89a (see Appendix H). If licenses are renewed biennially, workforce data would only be updated every two years. It is important to note that implementation of biennial license renewal either simultaneously with or prior to the implementation of on-line license renewal will impact the Department's ability to implement the on-line renewal process by July 1, 2009 and the time it will take for the Department to collect the required nursing workforce data.

CONCLUSIONS/RECOMMENDATIONS

The Department has no specific recommendations concerning whether biennial license renewal should be implemented for nurses, however the Department urges the Committee to consider the identified implications.

In the event that the General Assembly enacts legislation to implement biennial licensing for nurses, the Department recommends that it not be effective until at least one year after the implementation date on on-line license renewals for nurses.

Section 50 of Public Act 08-184

On or before January 1, 2009, the department shall submit, in accordance with section 11-4a, a report on the feasibility and implications of the implementation of a biennial license renewal system for persons holding a license to practice nursing under chapter 378 to the joint standing committee of the General Assembly having cognizance of matters relating to public health.

Section 19 of Public Act 03-03 of the June 2003 Special Session

Subsection (e) of section 19a-88 of the general statutes, as amended by section 9 of public act 00-226, is repealed and the following is substituted in lieu thereof (*Effective January 1, 2004*):

(e) (1) Each person holding a license or certificate issued under section [19a-514,] 20-65k, 20-74s, 20-195cc or 20-206ll and chapters 370 to 373, inclusive, 375, 378 to 381a, inclusive, 383 to [388] 383c, inclusive, 384, 384b, 384d, 385, 393a, 395, [398,] 399 or 400a and section 20-206n or 20-206o shall, annually, during the month of such person's birth, apply for renewal of such license or certificate to the Department of Public Health, giving such person's name in full, such person's residence and business address and such other information as the department requests.

(2) Each person holding a license or certificate issued under section 19a-514 and chapters 384a, 384c, 386, 387, 388 and 398 shall apply for renewal of such license or certificate once every two years, during the month of such person's birth, giving such person's name in full, such person's residence and business address and such other information as the department requests.

(3) Each person holding a license or certificate issued pursuant to section 20-475 or 20-476 shall, annually, during the month of such person's birth, apply for renewal of such license or certificate to the department.

(4) Each entity holding a license issued pursuant to section 20-475 shall, annually, during the anniversary month of initial licensure, apply for renewal of such license or certificate to the department.

Health Practitioner Licenses: Renewal Fees and Schedules

<i>Profession</i>	<i>Renewal Fee</i>	<i>Renewal Schedule</i>
Acupuncturist	\$ 200.00	Biennial
Advanced Practice Registered Nurse	\$120.00	Annual
Athletic Trainer	\$ 100.00	Annual
Audiologist	\$ 100.00	Annual
Barber	\$ 50.00	Biennial
Certified Alcohol and Drug Counselor	\$ 150.00	Annual
Chiropractor	\$ 450.00	Annual
Dental Hygienist	\$ 50.00	Annual
Dentist	\$ 450.00	Annual
Dietitian/Nutritionist	\$ 50.00	Annual
Electrologist	\$ 100.00	Biennial
Embalmer	\$ 55.00	Annual
Funeral Director	\$ 115.00	Annual
Hairdresser/Cosmetician	\$ 50.00	Biennial
Homeopathic Physician	\$ 450.00	Annual
Licensed Alcohol and Drug Counselor	\$ 150.00	Annual
Licensed Clinical Social Worker	\$ 150.00	Annual
Licensed Midwife	\$ 5.00	Annual
Licensed Nurse Midwife	\$ 120.00	Annual
Licensed Practical Nurse	\$ 60.00	Annual
Marital and Family Therapist	\$ 250.00	Annual
Massage Therapist	\$ 200.00	Biennial
Naturopathic Physician	\$ 450.00	Annual
Nursing Home Administrator	\$ 100.00	Biennial
Occupational Therapist	\$ 100.00	Biennial
Occupational Therapy Assistant	\$ 100.00	Biennial
Optician	\$ 100.00	Annual
Optometrist	\$ 300.00	Annual
Perfusionist	\$ 250.00	Annual
Physical Therapist	\$ 50.00	Annual
Physical Therapist Assistant	\$ 30.00	Annual
Physician Assistant	\$ 75.00	Annual
Physician/Surgeon	\$ 450.00	Annual
Podiatrist	\$ 450.00	Annual
Professional Counselor	\$ 150.00	Annual
Psychologist	\$ 450.00	Annual
Radiographer	\$ 50.00	Annual
Registered Nurse	\$100.00	Annual
Respiratory Care Practitioner	\$ 50.00	Annual
Retired Advanced Practice Registered Nurse	\$ 6.00	Annual
Retired Licensed Practical Nurse	\$ 3.00	Annual
Retired Registered Nurse	\$ 5.00	Annual
Speech and Language Pathologist	\$ 100.00	Annual
Veterinarian	\$ 450.00	Annual

Nurse License Renewal Fees and Schedules in Other States

Jurisdiction	Renewal Schedule	RN	LPN
Alabama	Biennial	\$75	\$75
Alaska	Biennial	\$215	\$215
Arizona	Annual	\$150	\$150
Arkansas	Biennial	\$65	\$75
California	Biennial		\$125
Colorado	Biennial	\$106	\$139
Connecticut	Annual	\$30	\$50
DC	Biennial	\$111	\$111
Delaware	Biennial	\$77	\$77
Florida	Biennial	\$65	\$65
Georgia	Biennial	\$65	\$60
Hawaii	Biennial	\$90	\$90
Idaho	Biennial	\$90	\$90
Illinois	Biennial	\$60	\$60
Indiana	Biennial	\$50	\$50
Iowa	Annual	\$99	\$99
Kansas	Biennial	\$60	\$60
Kentucky	Annual	\$50	\$50
Louisiana	Annual	\$80	\$30
Maine	Biennial	\$50	\$75
Maryland	Annual	\$55	\$55
Massachusetts	Biennial	\$80	\$80
Michigan	Biennial	\$48	\$48
Minnesota	Biennial	\$85	\$85
Mississippi	Biennial	\$100	\$100
Missouri	Biennial	\$72	\$80
Montana	Biennial	\$100	\$100
Nebraska	Biennial	\$75	\$75
Nevada	Biennial	\$100	\$100
New Hampshire	Biennial	\$100	\$100
New Jersey	Biennial	\$65	\$65
New Mexico	Biennial	\$93	\$93
New York	Annual	\$65	\$65
North Carolina	Biennial	\$92	\$92
North Dakota	Biennial	\$80	\$90
Ohio	Biennial	\$65	\$65
Oklahoma	Biennial	\$75	\$75
Oregon	Biennial	\$85	\$85
Pennsylvania	Biennial	\$40	\$45
Rhode Island	Biennial	\$63	\$63
South Carolina	Biennial	\$64	\$64
South Dakota	Biennial	\$90	\$90
Texas	Biennial	\$53	\$53
Utah	Biennial	\$58	\$58
Vermont	Biennial	\$95	\$95
Virginia	Biennial	\$95	\$95
Washington	Annual	\$50	\$50
West Virginia	Annual	\$50	\$35
Wisconsin	Biennial	\$69	\$66
Wyoming	Biennial	\$90	\$110

Section 139 of Public Act 07-01 of the June 2007 Special Session

Subsection (c) of section 19a-88 of the general statutes is repealed and the following is substituted in lieu thereof (*Effective July 1, 2007*):

(c) (1) Each person holding a license to practice as a registered nurse, shall, annually, during the month of such person's birth, register with the Department of Public Health, upon payment of [~~the professional services fee for class B, as defined in section 33-182/~~] one hundred dollars, on blanks to be furnished by the department for such purpose, giving such person's name in full, such person's residence and business address and such other information as the department requests. Each person holding a license to practice as a registered nurse who has retired from the profession may renew such license, but the fee shall be ten per cent of the professional services fee for class B, as defined in section 33-182/. Any license provided by the department at a reduced fee shall indicate that the registered nurse is retired.

(2) Each person holding a license as an advanced practice registered nurse shall, annually, during the month of such person's birth, register with the Department of Public Health, upon payment of [~~the professional services fee for class C, as defined in section 33-182/~~] one hundred twenty dollars, on blanks to be furnished by the department for such purpose, giving such person's name in full, such person's residence and business address and such other information as the department requests. No such license shall be renewed unless the department is satisfied that the person maintains current certification as either a nurse practitioner, a clinical nurse specialist or a nurse anesthetist from one of the following national certifying bodies which certify nurses in advanced practice: The American Nurses' Association, the Nurses' Association of the American College of Obstetricians and Gynecologists Certification Corporation, the National Board of Pediatric Nurse Practitioners and Associates or the American Association of Nurse Anesthetists. Each person holding a license to practice as an advanced practice registered nurse who has retired from the profession may renew such license, but the fee shall be ten per cent of the professional services fee for class C, as defined in section 33-182/. Any license provided by the department at a reduced fee shall indicate that the advanced practice registered nurse is retired.

(3) Each person holding a license as a licensed practical nurse shall, annually, during the month of such person's birth, register with the Department of Public Health, upon payment of the professional services fee for class [~~A~~] C, as defined in section 33-182/, on blanks to be furnished by the department for such purpose, giving such person's name in full, such person's residence and business address and such other information as the department requests. Each person holding a license to practice as a licensed practical nurse who has retired from the profession may renew such license, but the fee shall be ten per cent of the professional services fee for class A, as defined in section 33-182/. Any license provided by the department at a reduced fee shall indicate that the licensed practical nurse is retired.

(4) Each person holding a license as a nurse-midwife shall, annually, during the month of such person's birth, register with the Department of Public Health, upon payment of [the professional services fee for class C, as defined in section 33-182/] one hundred twenty dollars, on blanks to be furnished by the department for such purpose, giving such person's name in full, such person's residence and business address and such other information as the department requests. No such license shall be renewed unless the department is satisfied that the person maintains current certification from the American College of Nurse-Midwives.

(5) (A) Each person holding a license to practice physical therapy shall, annually, during the month of such person's birth, register with the Department of Public Health, upon payment of the professional services fee for class B, as defined in section 33-182/, on blanks to be furnished by the department for such purpose, giving such person's name in full, such person's residence and business address and such other information as the department requests.

(B) Each person holding a physical therapist assistant license shall, annually, during the month of such person's birth, register with the Department of Public Health, upon payment of the professional services fee for class A, as defined in section 33-182/, on blanks to be furnished by the department for such purpose, giving such person's name in full, such person's residence and business address and such other information as the department requests.

(6) Each person holding a license as a physician assistant shall, annually, during the month of such person's birth, register with the Department of Public Health, upon payment of a fee of seventy-five dollars, on blanks to be furnished by the department for such purpose, giving such person's name in full, such person's residence and business address and such other information as the department requests. No such license shall be renewed unless the department is satisfied that the practitioner has met the mandatory continuing medical education requirements of the National Commission on Certification of Physician Assistants or a successor organization for the certification or recertification of physician assistants that may be approved by the department and has passed any examination or continued competency assessment the passage of which may be required by said commission for maintenance of current certification by said commission.

ANNUAL REVENUE GENERATED FROM NURSE LICENSE RENEWAL FEES

Licensure Category	# Licensees	Fee Amount	Estimated Annual Revenue FY2010	Estimated Annual Revenue FY2011
APRN	3,043	\$120.00	\$ 365,160.00	\$ 365,160.00
LPN	12,259	\$ 60.00	\$ 735,540.00	\$ 735,540.00
RN	53,284	\$100.00	\$ 5,328,400.00	\$ 5,328,400.00
Retired APRN	26	\$ 6.00	\$ 156.00	\$ 156.00
Retired LPN	382	\$ 3.00	\$ 1,146.00	\$ 1,146.00
Retired RN	2,881	\$ 5.00	\$ 14,405.00	\$ 14,405.00
Totals:	71,875		\$ 6,444,807.00	\$ 6,444,807.00

**ESTIMATED ANNUAL REVENUE GENERATED FROM BIENNIAL NURSE LICENSE
RENEWAL FEES
JULY 1, 2009 IMPLEMENTATION DATE, NO FEE CHANGE**

Licensure Category	# Licensees	Fee Amount	Anticipated Annual Revenue FY2010	Anticipated Annual Revenue FY2011
APRN	3,043	\$120.00	\$ 365,160.00	\$ 0.00
LPN	12,259	\$ 60.00	\$ 735,540.00	\$ 0.00
RN	53,284	\$100.00	\$ 5,328,400.00	\$ 0.00
Retired APRN	26	\$ 6.00	\$ 156.00	\$ 0.00
Retired LPN	382	\$ 3.00	\$ 1,146.00	\$ 0.00
Retired RN	2,881	\$ 5.00	\$ 14,405.00	\$ 0.00
Totals:	71,875		\$ 6,444,807.00	\$ 0.00

**ESTIMATED ANNUAL REVENUE GENERATED FROM BIENNIAL NURSE LICENSE
RENEWAL FEES
JANUARY 1, 2010 IMPLEMENTATION DATE, NO FEE CHANGE**

Licensure Category	# Licensees	Fee Amount	Anticipated Annual Revenue FY2010	Anticipated Annual Revenue FY2011
APRN	3,043	\$120.00	\$182,580.00	\$182,580.00
LPN	12,259	\$ 60.00	\$367,770.00	\$367,770.00
RN	53,284	\$100.00	\$2,664,200.00	\$2,664,200.00
Retired APRN	26	\$ 6.00	\$78.00	\$78.00
Retired LPN	382	\$ 3.00	\$573.00	\$573.00
Retired RN	2,881	\$ 5.00	\$7,202.50	\$7,202.50
Totals:	71,875		\$3,222,403.50	\$3,222,403.50

**ESTIMATED ANNUAL REVENUE GENERATED FROM BIENNIAL NURSE LICENSE
RENEWAL FEES
JANUARY 1, 2010 IMPLEMENTATION DATE, DOUBLE LICENSE FEE**

Licensure Category	# Licensees	Fee Amount	Anticipated Annual Revenue FY2010	Anticipated Annual Revenue FY2011
APRN	3,043	\$240.00	\$365,160.00	\$365,160.00
LPN	12,259	\$120.00	\$735,540.00	\$735,540.00
RN	53,284	\$200.00	\$5,328,400.00	\$5,328,400.00
Retired APRN	26	\$12.00	\$156.00	\$156.00
Retired LPN	382	\$6.00	\$1,146.00	\$1,146.00
Retired RN	2,881	\$10.00	\$14,405.00	\$14,405.00
Totals:	71,875		\$6,444,807.00	\$6,444,807.00

CONNECTICUT GENERAL STATUTES, SECTION 19a-89a

Database on nursing personnel. The Department of Public Health, in consultation with the State Board of Examiners for Nursing, shall establish a database on nursing personnel to assist the department, the board, other state agencies, employers of nurses, educational institutions and professional and health care industry associations and societies in planning for nurse staffing patterns and practices, and in developing and implementing their respective programs and activities.