



**Pennsylvania Senate Consumer Protection & Professional Licensure Committee Hearing:
Healthcare Licensure Delays
April 24, 2023**

**Testimony of Sarah Biggs, Assistant Vice President of Talent Acquisition, St. Luke's
University Health Network**

Thank you to Chairman Patrick Stefano, Chairwoman Lisa Boscola, and members of the Senate Consumer Protection & Professional Licensure Committee for inviting me to testify before you today.

My name is Sarah Biggs, I am the Assistant Vice President of Talent Acquisition for St. Luke's University Health Network (St. Luke's). St. Luke's is a non-profit, regional, fully integrated, nationally recognized network providing services at 14 campuses and more than 300 sites in Lehigh, Northampton, Carbon, Schuylkill, Bucks, Montgomery, Berks, Monroe and Luzerne counties in Pennsylvania and Warren and Hunterdon counties in New Jersey.

In my role at St. Luke's, I am responsible for the Network's overall talent strategy inclusive of maintaining and evolving St. Luke's employment brand, strategic full cycle talent initiatives aligned with the goal of meeting network wide staffing needs and creating efficiency in talent processes and procedures across all 14 hospital campuses within our Network. I am also responsible for ensuring that the Talent Acquisition Team is aligned with Network staffing needs, has access to the required necessary sourcing tools, and operates in partnership with hiring managers to secure the most appropriate talent.

Impact of Delays on Physicians

Delayed licenses result in deferred employment and a shortage of physicians to care for the patients in the communities we serve, as well as a significant loss in income for the providers.

In 2022, nearly 20% of the physicians we hired at St. Luke's experienced licensing delays which resulted in having to reschedule patient appointments and/or a period where they were able to see patients but due to the additional time of credentialing, their services were not covered by insurance payers.

The Board of Medicine is currently reporting that the licensing turn-around time is 30-60 days, however, in tracking the delays, they appear to occur cyclically and affect physicians with initial start dates between July and September. The delay in reviewing these applications appears to extend from late April to early October. During this time, license review regularly takes 120-180 days. It seems that nothing is done to help the licensing staff handle the increase in applications during those times. These delay times apply to both physician and nursing licenses.



Impact of Delays on Nurses

St. Luke's is privileged to have the oldest continuous running nursing school in the country. This tremendous asset enables us to have a robust pipeline of Graduate Nurses (GN)s. We have however been challenged in getting them transitioned post-graduation with the delays in processing and testing.

Post nursing school graduation, a GN can receive their Temporary Practice Permit (TPP) and their Authorization to Test (ATT). The TPP allows GNs to work while preparing to take boards. The challenge has been in the delays with receiving both the TPP and the ATT. When those are not received, the GN is placed a very difficult position as is the health system. These delays lead to lost income, perpetual staffing challenges, as well as increased financial expense for health systems as agency nurses may need to be utilized at much higher costs. An extreme example of this occurred in July 2022, when approximately 20 hires at one hospital campus could not start work due to delays in Temporary Practice Permits (TPP) and/or board results not being uploaded in a timely manner.

When a GN has received their ATT, some additional challenges have been presenting. Scheduling to take the National Clinical Licensing Education Exam (NCLEX) has been difficult due to the lack of available testing slots presented to GNs. When the test is taken and passed, the delay in uploading the RN license has taken upwards of weeks to months. This has the same downstream impacts as referenced above.

Pennsylvania is projected to have the worst nursing shortfall of all 50 states - in fact, a recent Hospital and Healthsystem Association of Pennsylvania (HAP) survey found a 31% vacancy rate for direct care Registered Nurses (RNs) in hospitals statewide. Licensing process delays have real, immediate, and negative effects in filling open positions to care for patients. In April 2022, Pennsylvania's Joint State Government Commission reported that the Commonwealth issues an average of 15,000 nursing-related licenses annually. They also found that actual processing times are significantly underreported by relevant authorities and are, in fact, among the slowest in the nation.

Impact of Delays on Patient Care

I spoke with my colleagues who manage patient scheduling, and they provided me with the following specific examples of how delayed start dates impacted patient care:

- “We had to reschedule about 75 patients in total. The other 3 providers tried to squeeze the additional patients in, but some had to be pushed off at least 3 weeks.”
- “We already had a shortage of providers at [that location] so it created a hardship for getting patients seen. Patients who could not get an appointment were being referred to urgent care centers.”



- “The impact was twofold, first was the delay in scheduling new patient well visits by at least two weeks, and second was having to reschedule all sick visits with existing providers within the practice which in some cases resulted in overbookings. We tried our best to keep the same dates and times for the patients, however, this was not possible 100% of the time.”

Impact of Delays to Provider Morale

Licensing delays impact the onboarding and orientation of new providers, hospital operations, and the ability to stabilize schedules. Current providers must adapt schedules for those who are delayed, working different or overtime shifts to cover the gap. Providers may become unsatisfied with having to flex their schedules to make sure all the shifts are covered, especially if there isn't a date certain on when they will be able to return to a normal schedule.

Licensing Process Deficiencies

The lack of staff in the licensing department leads to a deficiency in two-way communication and an increase in frustration for all involved. Our applicants have reported that they have been unable to reach the license board staff for clarification on statuses or to seek help understanding what documents may be incorrect or outstanding. For example:

- The website portal for applicants does not update in real time. Documents sent are not updated upon receipt, leading to concern, confusion, and duplication of effort for applicants and an increase in call volume for the licensing board staff.
- Applicants who call the state are told by the licensing staff that documents sent have not been received, including documents sent electronically with confirmed delivery. At times applicants then pay additional fees to request these items be sent again by their school, another state licensing board, or the authorities that completed their background checks.
- Applicants calling for help are typically told no more than, “applications are reviewed in the order they are received.” Licensing staff are unable to answer questions about documentation received or still needed, estimated time before the application will be reviewed, or give any clarity on instructions applicants find confusing.

Our hospital administration is often being asked to intervene in the licensing process because of these communication deficiencies, and we have had to ask our elected officials and their staff for assistance on numerous occasions.



Recommendations for Solutions

St. Luke's collaborates with other hospitals across Pennsylvania and with HAP on a number of issues. We have, for example, been pursuing large-scale solutions to address the national shortage of nurses and other health professionals.

Governor Shapiro has issued an executive order that aims to address the timeliness and unpredictability associated with commonwealth-issued licenses, certificates, and permits. It requires, among other things, that state agencies establish recommended application processing times and identify the resources they need to be able to achieve them.

With that being said, we respectfully urge the General Assembly to authorize adequate funding to the Department of State to increase the total staff compliment and adjust, if necessary, the classification and compensation parameters for the Bureau of Professional and Occupational Affairs.

St. Luke's appreciates the commonwealth's efforts to replace its existing and ineffective online licensure system with an eye toward streamlining applications and renewals and acknowledges that the Department of State has worked to address licensing boards' workflows. Despite these efforts, however, we, along with many other hospitals statewide, continue to experience significant frustration in onboarding practitioners and nurses.

We would request that the Department of State work actively with the health care provider community in every stage of the business process validation, design, testing, and implementation of the new system. Such input is critical to ensure that any new arrangement truly meets providers' needs to ensure that well-qualified practitioners are positioned to meet Pennsylvanians' health care needs.

It is vital that Department of State extend its customer-centered design work into all aspects of agency and licensing board operations. Accountability should be a key component of this effort and can be achieved by posting up-to-date licensing and enrollment volumes, targets, and actual timeframes.

Finally, COVID-19 waivers clearly proved that safe and quality care can and does occur under conditional approvals. As licensing and credentialing delays continue to impede health care providers - such as nurses and physicians - we ask that policymakers consider a program for provisional approvals.

Respectfully submitted,

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