May 4, 2020

The Board of Registered Nursing (Board) is aware of some potential uncertainty regarding the interpretation of California Code of Regulations, title 16, section 1484, with regard to the issue of the minimum number of clinical hours of supervised direct patient care experiences that are required during the course of nurse practitioner education. Specifically:

- Section 1484(h)(5) states: "The program shall meet the minimum of 500 clinical hours of supervised direct patient care experiences as specified in current nurse practitioner national education standards. Additional clinical hours required for preparation in more than one category shall be identified and documented in the curriculum plan for each category."

- Section 1484(h)(8) provides a formula for calculating the course of instruction program units and contact hours, and subdivision (h)(9) provides that, "Supervised clinical practice shall consist of at least 12 semester units or 18 quarter units." Reading subsections (h)(8) and (h)(9) in conjunction has been construed to suggest that a minimum of 540 clinical hours of direct patient care are required, as opposed to the 500 hours referenced in subsection (h)(5).

The regulatory intent behind the language in subsection (h)(5) was to establish a standard that is consistent with the national nurse practitioner education standards referenced in section 1484(a), which generally requires 500 hours as the minimum. The Board is evaluating options to resolve this potential discrepancy, which may take some time. In the meantime, please be advised that the Board intends to enforce the 500 hour minimum referenced in section 1484(h)(5), not 540 hours.

Questions or concerns relating to this issue can be addressed to a program’s assigned nursing education consultant.

Sincerely,

Loretta Melby RN, MSN
Acting Executive Officer
Board of Registered Nursing