

Non-Physician Practitioners: Florida

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A Q&A guide to state provisions regarding scope of practice for non-physician practitioners (NPPs), limited to nurse practitioners (NPs), clinical nurse specialists, certified registered nurse anesthetists (CRNAs), certified nurse-midwives, physician assistants (PAs), and clinical social workers in Florida. This Q&A addresses licensing requirements, scope of practice, non-competes, and other restrictions. Answers to questions can be compared across a number of jurisdictions (see Non-Physician Practitioners: State Q&A Tool).

Licensing and Continuing Education Requirements

1. Please specify the licensing requirements and the state agency that oversees the licensing and regulation for the following non-physician practitioners (NPPs) in your jurisdiction:

- Advanced practice registered nurses or their equivalent, including:
 - certified nurse practitioners or their equivalent;
 - clinical nurse specialists or their equivalent;
 - certified registered nurse anesthetists or their equivalent; and
- certified nurse-midwives or their equivalent.
- Physician assistants or their equivalent.
- Clinical social workers or their equivalent.

Advanced Practice Registered Nurse

Licensing Requirements

In Florida, the profession of advanced practice registered nurse (APRN) includes:

- Certified nurse practitioners (NPs).
- Clinical nurse specialists (CNSs).

- Certified registered nurse anesthetists (CRNAs).
- Certified nurse midwives (CNMs).
- Psychiatric nurses (PNs).

(§§ 464.004(3) and 464.012, Fla. Stat.)

An APRN is a registered nurse (RN) holding a current RN license (or an active multistate license under § 464.0095, Fla. Stat.) and a master's degree in a nursing clinical specialty area. APRNs are subject to licensing requirements. (§ 464.012(1), Fla. Stat.) For more information on each profession's scope of practice, see Question 5. For information on autonomous practice registration requirements for APRNs under § 464.0123, Fla. Stat., see Question 6.

To be licensed as an APRN, the applicant must:

- Hold a current RN license or an active multistate license to practice professional nursing.
- Be certified by an appropriate specialty board required to be initially licensed in Florida.
- Have graduated from a master's degree program in a nursing clinical specialty area with preparation in specialized practitioner skills, provided that applicants graduating on or after:
 - October 1, 2001, must have graduated from a master's degree program to become initially licensed as a CRNA;
 - October 1, 1998, must have graduated from a master's degree program to be initially licensed as a CNM; or

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- July 1, 2007, must have graduated from a master’s degree program to be initially licensed as a CNS.
- Have proof of malpractice insurance or exemption.
- Complete electronic fingerprinting using a Florida Department of Law Enforcement (FDLE)-approved Livescan service provider, with results submitted electronically to the Care Provider Background Screening Clearinghouse. Hard fingerprint cards or paper results are not acceptable.
- Apply and pay the required fees, including a license fee of \$110.

(§ 464.012(1), Fla. Stat.; Fla. Admin. Code R. 64B9-4; [Florida Board of Nursing: Licensing: APRN.](#))

State Agency

The [Florida Board of Nursing](#) oversees the licensing and regulation of APRNs (§ 464.012(1), Fla. Stat.).

Nurse Practitioner

See Advanced Practice Registered Nurse.

Clinical Nurse Specialist

See Advanced Practice Registered Nurse.

Certified Registered Nurse Anesthetist

See Advanced Practice Registered Nurse.

Certified Nurse Midwives

See Advanced Practice Registered Nurse.

Psychiatric Nurses

See Advanced Practice Registered Nurse.

Physician Assistant

Licensing Requirements

A physician’s assistant (PA) is a health care professional who:

- Is a graduate of an approved physician assistant program (or who meets standards approved by the Florida Board of Medicine and the Florida Board of Osteopathic Medicine, as applicable).

- Is licensed to perform medical services delegated by the supervising physician (§ 458.347(2)(e), Fla. Stat.) or osteopathic physician. (§§ 458.347(2)(e), Fla. Stat. and 459.022(2)(e), Fla. Stat.)

To be licensed as a PA, an applicant must:

- Be at least 18 years old.
 - Have completed an approved physician assistant training program. For applicants matriculating after December 31, 2020, this generally requires a master’s degree; applicants who matriculated on or before December 31, 2020 may qualify with a bachelor’s or master’s degree from an approved program, and earlier graduates are subject to grandfathering criteria in the statute.
 - Obtain a passing score on the physician assistant national certifying examination administered by the [National Commission on Certification of Physician Assistants](#) (NCCPA), be nationally certified, and hold a current NCCPA certificate. If the applicant does not hold a current certificate and has not actively practiced as a PA in the immediately previous four years, the applicant must retake and successfully complete the NCCPA entry-level examination to be eligible for licensure.
 - Complete electronic fingerprinting using a FDLE-approved Livescan service provider, with results submitted electronically to the Care Provider Background Screening Clearinghouse. Hard fingerprint cards or paper results are not acceptable.
 - Complete an application form and pay a fee of up to \$300. The application must include:
 - a diploma from an approved physician assistant program in the US or its territories that is accredited by the Accreditation Review Commission on Education for the Physician Assistant or, for programs before 2001, by its predecessor accrediting bodies and formally approved by the boards;
 - acknowledgment of any prior felony convictions; and
 - acknowledgment of any previous revocation or denial of licensure or certification in any state.
- (§§ 458.347(6)(a) and 459.022(6)(a), Fla. Stat.; Fla. Admin. Code R. 6488-30.003, 64815-6; [Florida Board of Medicine: Licensing: PA.](#))

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The [Florida Department of Health](#) may issue a temporary license to a recent PA graduate who is registered or otherwise qualified to take the proficiency examination administered by the NCCPA. For licenses issued under chapter 458, the temporary license expires 30 days after the department receives the examination scores. For licenses issued under chapter 459, the temporary license expires when the department receives the examination scores. An applicant may be granted a maximum of two temporary licenses. The Council on Physician Assistants may require an applicant who has not passed the examination within five attempts to complete additional remedial education or training. (§§ 458.347(6)(d) and 459.022(6)(d), Fla. Stat.; Fla. Admin. Code R. 64B8-30.003(2) and 64B15-6.003(2); [Florida Board of Medicine: Licensing: PA.](#))

State Agency

The [Florida Board of Medicine](#) and the [Florida Board of Osteopathic Medicine](#) oversee the licensing and regulation of PAs (§§ 458.347 and 459.022, Fla. Stat.).

Licensed Clinical Social Worker

Licensing Requirements

A licensed clinical social worker (LCSW) is a practitioner practicing clinical social work without supervision.

To be licensed as an LCSW, an applicant must:

- Apply and pay a fee of up to \$200.
- Submit to background screening under § 456.0135, Fla. Stat., including completing electronic fingerprinting using a FDLE-approved Livescan service provider with results submitted electronically to the Care Provider Background Screening Clearinghouse.
- Have a master's or doctoral degree in social work from a graduate school of social work that, at the time of graduation, was accredited by the Council on Social Work Education (CSWE) or the Canadian Association for Social Work Education or has been determined to be equivalent to a CSWE-approved program through CSWE's foreign equivalency process. The degree program must include:
 - 24 semester or 32 quarter hours in theory of human behavior and practice methods as courses in clinically oriented services, including at least one course in psychopathology; and

- a supervised field placement that was part of the applicant's advanced concentration in direct practice, during which the applicant provided clinical services directly to clients.
- Have at least two years of post-master's supervised clinical social work under the supervision of a licensed clinical social worker or the equivalent who is a qualified supervisor, which must consist of:
 - at least 100 hours of supervision in no less than 100 weeks;
 - 1,500 hours of face-to-face psychotherapy with clients; and
 - one hour of supervision every two weeks.
- Pass the examination developed by the Association of Social Work Boards. After January 1, 2023, examination approval will only be issued to applicants who have completed at least 18 months of post-master's clinical experience.
- Complete:
 - an eight-hour Florida laws and rules course;
 - a three-hour HIV/AIDS course; and
 - a two-hour domestic violence course within six months of licensure.

(§ 491.005(1), Fla. Stat.; Fla. Admin. Code R. 64B4-3.001 to 64B4.3008; [FBCMM: Licensing: Licensed Clinical Social Worker.](#))

An applicant with a social work degree from outside the US or Canada must submit documentation showing that the program is equivalent to the programs approved by the Council on Social Work Education by the International Social Work Degree Recognition and Evaluation Service provided by the Office of Social Work Accreditation (OSWA). Any applicant holding a license in any state or country other than Florida must also complete the [Florida Certification/License Verification Form.](#) ([FBCMM: Licensing: Licensed Clinical Social Worker.](#))

A person licensed as a clinical social worker, marriage and family therapist, or mental health counselor in another state who is practicing under the Professional Counselors Licensure Compact under § 491.017, Fla. Stat., and only within the scope provided in that compact, is exempt from these licensure requirements (§ 491.005(6), Fla. Stat.).

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State Agency

The [Florida Board of Clinical Social Work, Marriage & Family Therapy and Mental Health Counseling](#) oversees the licensing and regulation of licensed clinical social workers.

2. For each non-physician practitioner (NPP) identified in Question 1, please specify:

- The license or registration renewal period.
- The license or registration renewal requirements and any continuing education requirements.

Advanced Practice Registered Nurse

Renewal Period

In Florida, the profession of advanced practice registered nurse (APRN) includes:

- Certified nurse practitioners (NPs).
- Clinical nurse specialists (CNSs).
- Certified registered nurse anesthetists (CRNAs).
- Certified nurse midwives (CNMs).
- Psychiatric nurses (PNs).

(§§ 464.003(3) and 464.012(1), Fla. Stat.)

An APRN's license must be renewed every two years with the Florida Board of Nursing (§ 464.012(5), Fla. Stat.; [Florida Board of Nursing: Renewals: APRN](#)).

Renewal Requirements

An APRN must:

- Complete the required 30 hours of continuing education (CE) for each two-year renewal cycle and report them into [CE Broker](#) (a continuing education tracking system), including:
 - 16 hours of general nursing CE;
 - two hours of prevention of medical errors (every renewal);
 - two hours of Florida laws and rules (every renewal);
 - two hours of recognition of impairment in the workplace (every renewal);
 - two hours of human trafficking (every renewal);

- three hours of safe and effective prescription of controlled substances (every renewal);
- two hours of domestic violence (once every three renewal cycles, and these hours are in addition to the usual required hours);
- one hour of HIV/AIDS education (one time only, to be completed before the first renewal); and
- if the first APRN license did not cover a full two-year cycle, 1 hour of CE for each month the license was held during the first, shorter cycle; but
- if the APRN is nationally certified by an approved specialty board (accredited by the National Commission for Certifying Agencies or the Accreditation Board for Specialty Nursing Certification), the APRN may claim the general CE exemption allowed by § 464.013(3)(a), Fla. Stat., but the exemption does not apply to the controlled substance and human trafficking courses that must be completed every renewal.

- Submit a renewal application.
- Pay the renewal fee (currently \$60 for a timely active-to-active APRN renewal).
- Provide the address of the current primary place of practice.
- Verify the practitioner's profile.
- Complete the financial responsibility form.
- If applicable, submit proof of certification by an appropriate national specialty board.
- Complete mandatory background screening under § 456.0135, Fla. Stat., by ensuring the FDLE continues to retain the APRN's fingerprints for background screening. If the APRN's fingerprint retention is expiring in the current renewal period, a FDLE retention fee is collected at renewal. If the retention expires within the next 60 days, the APRN must pay the retention fee separately through the Clearinghouse Applicant Initiated (CHAI) system.
- Certain APRNs may qualify for waivers of some renewal fees and up to 25% of CE hours under statutory exemptions; however, these exemptions do not waive the CE requirements for domestic violence, HIV/AIDS, or medical errors. The exemptions are for:
 - active-duty military servicemembers or military spouses;

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- volunteer health services for medically indigent residents;
- public school health volunteering; or
- posting a schedule of charges as a primary care provider.

(§ 464.013, Fla. Stat.; Fla. Admin. Code R. 64B9-.002; [Florida Board of Nursing: Renewals: APRN.](#))

Nurse Practitioner

See Advanced Practice Registered Nurse.

Clinical Nurse Specialist

See Advanced Practice Registered Nurse.

Certified Registered Nurse Anesthetist

See Advanced Practice Registered Nurse.

Certified Nurse Midwives

See Advanced Practice Registered Nurse.

Psychiatric Nurse

See Advanced Practice Registered Nurse.

Physician Assistant

Renewal Period

A physician assistant's (PA) license must be renewed every two years, as applicable, with the [Florida Board of Medicine](#) or [Florida Board of Osteopathic Medicine](#) (§§ 458.347(6)(b) and 459.022(6)(b), Fla. Stat.; [Florida Board of Medicine: Renewals: PA](#)).

Renewal Requirements

A PA must:

- Complete the required continuing education (CE) for each two-year renewal cycle and report them into CE Broker (a continuing education tracking system). The CE requirements are:
 - for the first renewal, two hours of medical error education, one hour of Category I HIV/AIDS training, and 97 hours of general CE. A current NCCPA certification can substitute for the general CE requirement only; and
 - for renewals other than the first, 98 hours of general CE, two hours of medical error CE (every

renewal), and two hours of domestic violence CE (every third renewal cycle; these hours are included in the 100-hour total).

- Complete a renewal application, including acknowledgment of no felony convictions in the past two years.
- Pay a renewal fee of up to \$500.
- Provide the current primary place of practice address.
- Complete the required PA workforce survey with each renewal under §§ 458.347(6)(b)1.c and 459.022(6)(b)1.c, Fla. Stat.
- Complete mandatory background screening or maintain FDLE fingerprint retention under § 456.0135, Fla. Stat., by ensuring that FDLE continues to retain the PA's fingerprints for background screening. If the retention is expiring in the current renewal period, the retention fee is due at renewal. If the retention expires within the next 60 days, the PA must pay the retention fee through the CHAI system.
- In limited circumstances, a PA may qualify for waivers of some renewal fees and up to 25% of CE hours under statutory exemptions. However, these exemptions do not waive the CE requirements for domestic violence, HIV/AIDS, medical errors, or prescribing. The exemptions are for:
 - active-duty military servicemembers or military spouses; or
 - volunteer health services for medically indigent residents.

(§§ 458.347(6) and 459.022(6), Fla. Stat.; [Florida Board of Medicine: Renewals: PA](#).)

Licensed Clinical Social Worker

Renewal Period

A licensed clinical social worker's (LCSW) license must be renewed every two years (§ 491.007, Fla. Stat.; [FBCMM: Renewals: Licensed Clinical Social Worker](#)).

Renewal Requirements

An LCSW must complete a renewal application and pay a fee of up to \$250 (§ 491.007, Fla. Stat.; Fla. Admin. Code R. 64B4-4.005). Continuing education hours are not required for the first license renewal (§ 491.007, Fla. Stat.; Fla. Admin. Code R. 64B4-6.001(1)). Otherwise,

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each renewal requires 30 hours of continuing education, including:

- 25 general hours.
- Two hours in prevention of medical errors.
- Three hours in professional ethics and boundary issues or telehealth.
- Required every third renewal, three hours in laws and rules, which is included in the 25 general hours.
- Required every third renewal, two hours in domestic violence, which is included in the 25 general hours.
- For renewals beginning on March 31, 2023, four hours in qualified supervisor training for qualified supervisors only.

A maximum of six of the 30 required hours may be satisfied by attending programs to enhance the licensee's administrative, office management, or other non-clinical skills. (Fla. Admin. Code R. 64B4-6.001; [FBCMM: Renewals: Licensed Clinical Social Worker.](#))

Licensees seeking renewal must also maintain a mandatory background screening by ensuring that FDLE continues to retain the LCSW's fingerprints for background screening. If the retention is expiring in the current renewal period, the retention fee is due at renewal. If the retention expires within the next 60 days, the PA must pay the retention fee through the CHAI system. (§ 456.0135, Fla. Stat.)

3. What is the best way to confirm that a non-physician practitioner (NPP) is duly licensed? Are there consequences if an NPP is not properly licensed?

License Confirmation

A party may confirm that a non-physician practitioner is duly licensed by searching the Florida Department of Health's License Verification [page](#).

Consequences

There are several possible consequences if an NPP is not properly licensed, such as:

- A notice to cease and desist.
- An injunction.
- An administrative penalty between \$500 and \$5,000 for each violation.

- A circuit court penalty of \$500 to \$5000 for each violation. The court may also order court costs, reasonable attorney fees, and in some cases, the reasonable costs of investigation and prosecution.
- A criminal conviction including:
 - a felony of the third degree for practicing a health care profession without an active, valid Florida license. The minimum penalty is a fine of \$1,000 and a minimum mandatory period of incarceration of one year;
 - a felony of the second degree for practicing a health care profession without an active, valid Florida license if it results in a serious bodily injury. The minimum penalty is a fine of \$1,000 and a minimum mandatory period of incarceration of one year; or
 - a misdemeanor of the first degree for practicing a health care profession with an inactive or delinquent license for a period of up to 12 months. The minimum penalty is a term of imprisonment of 30 days and a fine of \$500. However, if the license has been inactive or delinquent for 12 months or more, that is a felony of the third degree.

(§ 456.065, Fla. Stat.)

Multistate Licenses

4. For each non-physician practitioner (NPP) identified in Question 1, what are the requirements to obtain a multistate license?

Advanced Practice Registered Nurse

In Florida, the profession of advanced practice registered nurse (APRN) includes:

- Certified nurse practitioners (NPs).
- Clinical nurse specialists (CNSs).
- Certified registered nurse anesthetists (CRNAs).
- Certified nurse midwives (CNMs).
- Psychiatric nurses (PNs).

(§§ 464.003(3) and 464.012(1), Fla. Stat.)

Florida is a member of the enhanced Nurse Licensure Compact (NLC), which creates a multistate license for registered nurses (RNs) or licensed practical or vocational nurses (LPNs/VNs). A nurse who holds a multistate license issued by a compact “home state” may practice in other compact states under a multistate licensure privilege. (§ 464.0095, Fla. Stat.)

APRN licensure itself is still state-specific. Florida has not adopted a separate APRN Compact. However, an APRN who holds a Florida RN license may apply to convert that RN license to a multistate RN license if the APRN meets the NLC’s uniform licensure criteria. Florida currently charges a one-time fee of \$100 to obtain the multistate RN license, which is then renewed on the same biennial schedule as the nurse’s RN license. (§§ 464.009 and 464.0095, Fla. Stat.; [Florida Board of Nursing: Nurse Compact FAQs: Multi-State License.](#))

Nurse Practitioner

See Advanced Practice Registered Nurse.

Clinical Nurse Specialist

See Advanced Practice Registered Nurse.

Certified Registered Nurse Anesthetist

See Advanced Practice Registered Nurse.

Certified Nurse Midwives

See Advanced Practice Registered Nurse.

Psychiatric Nurse

See Advanced Practice Registered Nurse.

Physician Assistant

Florida law does not address requirements to obtain a multistate license by a physician assistant.

Licensed Clinical Social Worker

Florida law does not address requirements to obtain a multistate license by a licensed clinical social worker.

Scope of Practice

5. For each non-physician practitioner (NPP) identified in Question 1, discuss whether your jurisdiction permits NPPs to:

- Evaluate patients.
- Diagnose, order, and interpret diagnostic tests.
- Initiate and manage treatments, including prescribing medications and controlled substances.

Although out of scope for this Q&A, Medicare coverage and billing requirements should also be considered as they impact what services the NPPs may perform, the level of supervision required, and payments to NPPs. For more information, see [Practice Note, Medicare Billing for Non-Physician Practitioners: Medicare Billing Options for NPP Services.](#)

Advanced Practice Registered Nurse

In Florida, the profession of advanced practice registered nurse (APRN) includes:

- Certified nurse practitioners (NPs).
- Clinical nurse specialists (CNSs).
- Certified registered nurse anesthetists (CRNAs).
- Certified nurse midwives (CNMs).
- Psychiatric nurses (PNs).

(§ 464.012(1), Fla. Stat.)

An APRN must perform functions authorized by law within the framework of an established protocol that must be maintained on site at the location or locations where the APRN practices. The established protocol sets out the specific functions the APRN and supervising practitioner have agreed the APRN can perform, in light of what services the APRN may perform under Florida law. (§ 464.012(3), Fla. Stat.)

In addition to the scope of practice specific to each APRN profession, generally, an APRN may:

- Prescribe, dispense, administer, or order any drug, subject to statutory requirements for prescribing and dispensing certain controlled substances.

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- Initiate appropriate therapies for certain conditions.
- Order diagnostic tests and physical and occupational therapy.
- Order any medication for administration to patients in hospitals, ambulatory surgery centers, or nursing homes, notwithstanding any provisions in chapter 465 or chapter 893.

(§ 464.012(3), Fla. Stat.)

Certified Nurse Practitioner

In addition to general APRN functions, an NP acting within the framework of an established protocol may:

- Manage selected medical problems.
- Order physical and occupational therapy.
- Initiate, monitor, or alter therapies for certain uncomplicated acute illnesses.
- Monitor and manage patients with stable chronic diseases.
- Establish behavioral problems and diagnoses and make treatment recommendations.

(§ 464.012(4)(a), Fla. Stat.)

Clinical Nurse Specialist

In addition to general APRN functions, a CNS acting within the framework of an established protocol may:

- Assess the health status of individuals and families using methods appropriate to the population and area of practice.
- Diagnose human responses to actual or potential health problems.
- Plan for health promotion, disease prevention, and therapeutic intervention in collaboration with the patient or client.
- Implement therapeutic interventions based on the nurse specialist's areas of expertise to advance nursing practice.
- Coordinate health care as necessary and evaluate the effectiveness of care with patients.

(§ 464.012(4)(d), Fla. Stat.)

Certified Registered Nurse Anesthetist

In addition to general APRN functions, a CRNA may, to the extent authorized by an established protocol

approved by the medical staff of the facility where the anesthetic service is performed, perform any of the following:

- Determine the health status of the patient regarding the risk factors and the anesthetic management of the patient through the performance of the general functions.
- Based on history, physical assessment, and supplemental laboratory results, and with the consent of the responsible physician, the appropriate type of anesthesia.
- Order preanesthetic medication.
- Perform anesthetic procedures, which includes ordering and administering regional, spinal, and general anesthesia, inhalation or intravenous agents and techniques, and hypnosis techniques to render the patient insensible to pain during surgical, obstetrical, therapeutic, or diagnostic clinical procedures.
- Support life functions during anesthesia health care, including induction and intubation procedures, the use of appropriate mechanical supportive devices, and the management of fluid, electrolyte, and blood component balances.
- Recognize and take appropriate corrective action for abnormal patient responses to anesthesia, adjunctive medication, or other forms of therapy.
- Recognize and treat a cardiac arrhythmia while the patient is under anesthetic care.
- Participate in management of the patient while in the post-anesthesia recovery area, including ordering the administration of fluids and drugs.
- Place special peripheral and central venous and arterial lines for blood sampling and monitoring as appropriate.

(§ 464.012(4)(b), Fla. Stat.)

Certified Nurse Midwives

In addition to general APRN functions, a CNM may, to the extent authorized by an established protocol approved by the medical staff of the health care facility where the midwifery services are performed or the nurse midwife's physician backup when the delivery is performed in the patient's home, perform any of the following:

- Perform superficial minor surgical procedures and postpartum examinations.

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- Manage the patient during labor and delivery to include amniotomy, episiotomy, and repair.
- Order, initiate, and perform appropriate anesthetic procedures.
- Order appropriate medications.
- Provide family-planning services and well-woman care.
- Manage the medical care of the normal obstetrical patient and the initial care of a newborn patient.

(§ 464.012(4)(c), Fla. Stat.)

Psychiatric Nurses

In addition to general APRN functions, a PN who meets the requirements of § 394.455, Fla. Stat. and is acting within the framework of an established protocol may prescribe psychotropic controlled substances to treat mental disorders (§ 464.012, Fla. Stat.).

Physician Assistant

A physician assistant (PA) may:

- Perform tasks and procedures within:
 - the supervising physician’s scope of practice; and
 - the PA’s own education and training.
- Work in any setting where the delegated tasks fall within the supervising physician’s scope of practice and the PA’s competence.
- In a medical emergency, maintain life support until a licensed physician assumes responsibility for the patient.

A supervising physician’s scope of practice consists of tasks and procedures that the physician is qualified by training or experience to perform. (§§ 458.347(4) and 459.022(4), Fla. Stat.; Fla. Admin. Code R. 64B8-30.012 and 64B15-6.010.)

The supervising physician decides whether the PA may perform a task or procedure under direct or indirect supervision based on:

- Reasonable medical judgment regarding the morbidity and mortality to the patient.
- The physician’s certainty of the PA’s knowledge and skill.

(§§ 458.347(4)(a) and 459.022(4)(a), Fla. Stat.; Fla. Admin. Code R. 64B8-30.012(2) and 64B15-6.010(2).)

A PA may prescribe or dispense medication if a supervising physician properly delegates this authority. The medication must be used in the supervising physician’s practice and must not be listed in the PA formulary. A PA may only prescribe or dispense medication if:

- The PA clearly identifies to the patient that they are a PA.
- The physician notifies the [Florida Department of Health](#) (FDOH) on a department-approved form of the physician’s intent to delegate prescriptive authority to the PA and of any change in the PA’s prescriptive privileges. Authority to dispense may be delegated only by a supervising physician registered as a dispensing practitioner in compliance with § 465.0276, Fla. Stat.
- The PA completes at least ten continuing medical education hours in the specialty practice in which the PA may prescribe medication with each license renewal. Three of these ten hours must be a course on the safe and effective prescribing of controlled substance medications from an approved provider.
- The PA notes the prescription or dispensing of medication in the appropriate medical record.
- The prescription, which may be in paper or electronic form, both:
 - complies with §§ 456.0392(1) and 456.42(1), Fla. Stat. and chapter 499 of the Florida Statutes; and
 - includes the PA’s name, address, and telephone number and the name of each supervising physician.

(§§ 458.347(4)(e) and 459.022(4)(e), Fla. Stat.)

Licensed Clinical Social Worker

A licensed clinical social worker may, among other things:

- Evaluate, diagnose, treat, and prevent emotional and mental disorders and cognitive, affective, or behavioral dysfunctions, sexual dysfunctions, alcoholism, and substance abuse.
- Prevent and treat undesired behavior and enhance mental health.
- Use psychotherapy, hypnotherapy, behavior modification, crisis intervention, and education of clients when using psychological methods in their clinical social work practice.

- Include clinical research into effective psychotherapeutic modalities for treatment and prevention of conditions.
- Provide clinical social work to individuals, couples, families, or groups.

(§ 491.003(8), Fla. Stat.)

Supervision

6. For each non-physician practitioner (NPP) identified in Question 1, what type of supervision does your jurisdiction require for NPPs? If your jurisdiction requires contractual or collaboration agreements between the NPP and the supervisor, please provide the exact contractual requirements.

Advanced Practice Registered Nurse

In Florida, the profession of advanced practice registered nurse (APRN) includes:

- Certified nurse practitioners (NPs).
- Clinical nurse specialists (CNSs).
- Certified registered nurse anesthetists (CRNAs).
- Certified nurse midwives (CNMs).
- Psychiatric nurses (PNs).

(§§ 464.003(3) and 464.012(1)(a), Fla. Stat.)

Supervision

An APRN must perform functions authorized by law within the framework of an established protocol maintained on site at the location or locations where the APRN practices, unless the APRN is registered and practicing autonomously under § 464.0123, Fla. Stat. If there are multiple supervising physicians in the same group, an APRN must enter into a supervisory protocol with at least one physician in the group practice. A practitioner currently licensed under Chapter 458, chapter 459, or chapter 466 must maintain supervision for directing the specific course of medical treatment. (§ 464.012(3), Fla. Stat.) When a physician enters into a formal supervisory relationship with an APRN, the physician must submit notice of the relationship to the Florida Board of Medicine or the Florida Board of Osteopathic Medicine within 30 days of entering

into or terminating the relationship or protocol (§§ 458.348(1) and 459.025(1), Fla. Stat.).

The established protocol sets out the specific functions the APRN and the supervising practitioner have agreed may be performed by the APRN based on the services Florida law authorizes an APRN to perform (§ 464.012(3), Fla. Stat.).

A written protocol between an APRN and the supervising physician may include:

- General information, including:
 - signatures of parties to the protocol (for practices with multiple physicians supervising the same APRNs, one delegated physician may sign);
 - names, addresses, APRN certificate numbers, and APRN DEA numbers if applicable;
 - the nature of the practice and primary and satellite locations; and
 - the date signed and dates amended with signatures of all parties.
- A collaborative practice agreement, including:
 - a description of an APRN's duties;
 - a description of a physician's duties;
 - the APRN's responsible management areas, including the conditions that the APRN may treat, the treatments that may be initiated, and drug therapies that may be prescribed, ordered, or monitored;
 - a provision for annual review by the parties; and
 - conditions and procedures for identifying conditions requiring direct evaluation by a physician.

The Florida Board of Nursing's website provides a sample [protocol](#). ([Florida Board of Nursing: Standard for Protocols: Physicians and APRNs.](#))

Florida statutes and regulations do not specifically dictate the level of supervision the supervising practitioner must provide. The sample protocol on the Florida Board of Nursing website states that "[t]his collaborative agreement is to establish and maintain a practice model in which the APRN will provide health care services under the general supervision of [name of authorized supervising physician, title]." The nursing statutes and regulations do not define "general supervision," though the physician and osteopathic physician-specific regulations set out a

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definition of “indirect supervision” that may potentially be applicable.

Practitioners should note that all protocols relating to electrolysis or electrology using laser or light-based hair removal or reduction by persons other than physicians or osteopathic physicians must require the person performing the service to be appropriately trained and work only under the direct supervision and responsibility of a physician or osteopathic physician. (§§ 458.348(2) and 459.025(2), Fla. Stat.)

Autonomous Practice

Florida law also allows autonomous practice, which does not require supervision by a physician or a supervisory protocol, of APRNs who are qualified and registered under § 464.0123, Fla. Stat. The applicant must demonstrate:

- An active, unencumbered license to practice as an APRN under § 464.012, Fla. Stat.
- That the applicant was not subject to disciplinary action in any state or jurisdiction within the five years preceding the registration.
- Completion of at least 3,000 clinical practice hours within the five years preceding the registration while practicing as an APRN under the supervision of an allopathic or osteopathic physician who held an active, unencumbered license during the period of supervision.
- Completion of three graduate-level semester hours (or the equivalent) in differential diagnosis and three graduate-level semester hours (or the equivalent) in pharmacology in the past five years.

(§ 464.0123(1), Fla. Stat.)

Unless an exception applies, an APRN must show the ability to pay claims and costs arising from rendering, or the failure to render, nursing care, treatment, or services by obtaining and maintaining either:

- Professional liability coverage of at least \$100,000 per claim, with a minimum annual aggregate of at least \$300,000 from an authorized insurer, a surplus lines insurer, a risk retention group, a Joint Underwriting Association, or a plan of self-insurance.
- An unexpired, irrevocable letter of credit of at least \$100,000 per claim, with a minimum aggregate availability of credit of at least \$300,000. The letter of credit must be payable to the APRN as

a beneficiary after final judgment of liability and awarding damages to be paid by the APRN or after all parties sign a settlement agreement.

(§ 464.0123(2), Fla. Stat.)

Autonomous APRNs may:

- Engage in autonomous practice only in primary care practice, including family medicine, general pediatrics, and general internal medicine, as defined by board rule.
- For certified nurse midwives (CNMs), engage in autonomous practice in the acts listed in § 464.012(4)(c), Fla. Stat.
- Perform the general functions of an APRN under § 464.012(3), Fla. Stat. related to primary care.
- For a patient who requires the services of a health care facility:
 - admit the patient to the facility;
 - manage the care received by the patient in the facility; and
 - discharge the patient from the facility, unless prohibited by federal law or rule.
- Provide a signature, certification, stamp, verification, affidavit, or endorsement otherwise required by law to be provided by a physician, except for issuing a physician certification under § 381.986, Fla. Stat.
- Effective March 21, 2024, for a CNM, provide out-of-hospital intrapartum care, only if a CNM engaged in the autonomous practice of nurse midwifery maintains a written policy for the transfer of patients needing a higher acuity of care or emergency services. The policy must prescribe and require the use of an emergency plan-of-care form, which must be signed by the patient before admission to intrapartum care.
- Not perform any surgical procedure other than a subcutaneous procedure.

(§ 464.0123(3), Fla. Stat.)

The [Florida Department of Health's](#) Council on Advanced Practice Registered Nurse Autonomous Practice recommends standards of practice for APRNs registered for autonomous practice (§ 464.0123(4)(d), Fla. Stat.). An autonomous APRN must renew their registration biennially at the same time as their regular license renewal. To do so, an autonomous APRN must complete:

Non-Physician Practitioners: Florida

- At least ten hours of continuing education approved by the [Florida Board of Nursing](#).
- 30 hours of continuing education required under § 464.013, Fla. Stat., even if the APRN would otherwise be exempt from CE based on national certification.

(§ 464.0123(5), Fla. Stat.)

Certified Nurse Practitioner

See Advanced Practice Registered Nurse.

Clinical Nurse Specialist

See Advanced Practice Registered Nurse.

Certified Registered Nurse Anesthetist

See Advanced Practice Registered Nurse.

Certified Nurse Midwives

See Advanced Practice Registered Nurse.

Psychiatric Nurse

See Advanced Practice Registered Nurse.

Physician Assistant

A physician must responsibly exercise control and provide direction over a physician assistant's (PA) services. The supervising physician must also periodically review the PA's performance by being easily available or physically present to the PA. The supervising physician decides whether the PA may perform a task or procedure under direct or indirect supervision based on:

- Reasonable medical judgment regarding the probability of morbidity and mortality to the patient.
- The physician's certainty of the PA's knowledge and skill.

(§§ 458.347(4)(a) and 459.022(4)(a), Fla. Stat.; Fla. Admin. Code R. 64B8-30.012(2) and 64B15-6.010(2).)

"Direct supervision" is the physical presence of the supervising physician on the premises so that they are immediately available to the PA when needed. "Indirect supervision" is the easy availability of the supervising physician to the PA, requiring them to be

within reasonable physical proximity but including the ability to communicate by telecommunications. (Fla. Admin. Code R. 64B8-30.001(4), (5) and 64B15-6.001(4), (5).)

To determine whether supervision is adequate, the following factors may be considered:

- The complexity of the task and risk to the patient.
- The PA's background, training, and skill.
- Setting in which the tasks are performed.
- Adequacy of the direction.
- Necessity for immediate attention.
- Availability of the physician.
- The number of other persons the supervising physician must supervise.

(Fla. Admin. Code R. 64B8-30.001(3) and 64B15-6.001(3).)

Licensed Clinical Social Worker

Florida law does not require supervision of a clinical social worker (LCSW) once fully licensed in Florida. However, an individual who is applying for licensure by examination or by endorsement and who intends to provide clinical social work services in Florida while completing remaining coursework or examination requirements must first obtain a provisional clinical social work license. (§ 496.0046, Fla. Stat.; Fla. Admin. Code R. 64B4-3.0075.)

A provisional licensee must:

- Meet the graduate degree and minimum coursework criteria in § 491.0046(2), Fla. Stat.
- Submit to background screening under § 456.0135, Fla. Stat.
- Practice under the supervision of a licensed mental health professional until the Department issues the full LCSW license.

A provisional license expires 24 months after issuance and cannot be renewed or reissued. (§ 491.0046, Fla. Stat.)

7. For each non-physician practitioner (NPP) identified in Question 1, does your jurisdiction limit how many NPPs a physician can supervise at one time?

Advanced Practice Registered Nurse

In Florida, the profession of advanced practice registered nurse (APRN) includes:

- Certified nurse practitioners (NPs).
- Clinical nurse specialists (CNSs).
- Certified registered nurse anesthetists (CRNAs).
- Certified nurse midwives (CNMs).
- Psychiatric nurses (PNs).

(§ 464.012(1)(a), Fla. Stat.)

Florida law does not set a numerical cap on how many APRNs a physician or osteopathic physician may supervise at one time. However, when a physician or osteopathic physician supervises APRNs or PAs in medical office settings where the APRN or PA is not under on-site supervision, the physician's supervision is limited by the number of offices beyond the physician's primary practice location for which the physician provides supervision over an APRN or PA, depending on the type of practice. A physician may supervise APRNs or PAs:

- For primary health care services in no more than four offices in addition to the physician's primary practice location.
- For specialty health care services in no more than two offices in addition to the physician's primary practice location.
- Where the services offered at the additional office are primarily dermatologic or skin care services, including aesthetic skin care services other than plastic surgery, in only one additional office and only if specific board certification and distance requirements are met.

(§§ 458.348(3) and 459.025(3), Fla. Stat.)

Nurse Practitioner

See Advanced Practice Registered Nurse.

Clinical Nurse Specialist

See Advanced Practice Registered Nurse.

Certified Registered Nurse Anesthetist

See Advanced Practice Registered Nurse.

Certified Nurse Midwives

See Advanced Practice Registered Nurse.

Psychiatric Nurse

See Advanced Practice Registered Nurse.

Physician Assistant

A physician may not supervise more than ten physician assistants at any one time (§§ 458.347(3) and 459.022(3), Fla. Stat.)

Licensed Clinical Social Worker

Florida law does not require fully licensed LCSWs to practice under supervision. Provisional licensees must practice under the supervision of a licensed mental health professional until fully licensed. (§ 491.0046(3), Fla. Stat.)

8. For each non-physician practitioner (NPP) identified in Question 1, does your jurisdiction require that physicians co-sign charts?

Advanced Practice Registered Nurse

In Florida, the profession of advanced practice registered nurse (APRN) includes:

- Certified nurse practitioners (NPs).
- Clinical nurse specialists (CNSs).
- Certified registered nurse anesthetists (CRNAs).
- Certified nurse midwives (CNMs).
- Psychiatric nurses (PNs).

(§§ 464.003(3) and 464.012(1)(a), Fla. Stat.)

Florida law does not address whether physicians must co-sign charts.

Nurse Practitioner

See Advanced Practice Registered Nurse.

Clinical Nurse Specialist

See Advanced Practice Registered Nurse.

Certified Registered Nurse Anesthetist

See Advanced Practice Registered Nurse.

Certified Nurse Midwives

See Advanced Practice Registered Nurse.

Psychiatric Nurse

See Advanced Practice Registered Nurse.

Physician Assistant

Florida law does not require supervising physicians to co-sign physician charts (§§ 458.347(3) and 459.022(3), Fla. Stat.). However, a supervising physician, employer, or facility may adopt their own chart review or co-signature requirements by policy or contract.

Licensed Clinical Social Worker

Florida law does not require fully licensed clinical social workers to practice under supervision. Provisional licensees must practice under the supervision of a licensed mental health professional until fully licensed (§ 491.0046(3), Fla. Stat.) Florida law does not address whether supervisors must co-sign the charts or records of provisional licensees.

Non-Compete Laws

9. Does your jurisdiction have non-compete provisions for the non-physician practitioners (NPPs) listed in Question 1?

There are no specific provisions relating to non-compete provisions for non-physician practitioners under Florida law. The general restrictive covenant law under § 542.335, Fla. Stat., applies. An employer must generally show that the non-compete is reasonably necessary to protect a legitimate business interest (§ 542.335(1)(c), Fla. Stat.). These contracts or provisions must be reasonable in time, area, and line of business (§ 542.335(1), Fla. Stat.).

Other Limitations

10. Other than licensure, scope of practice concerns, supervision requirements, and non-competes, does your jurisdiction have any other limitations on non-physician practitioners (NPPs) listed in Question 1?

There are no other limitations on non-physician practitioners in Florida.

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