

## New Jersey Observer Training and Qualification Requirements Effective April 18, 2026

Healthcare Law Update

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5/1/2026

Effective April 18, 2026, certain requirements regarding observer training and qualifications went into effect. On October 20, 2025, the Board [amended](#) its longstanding observer regulation to strengthen patients' rights and clarify licensee responsibilities when an observer is present during breast, pelvic, genital, and rectal examinations. While much of the amended regulation took effect on October 20, 2025, the observer training and qualification requirements went into effect on April 18, 2026. The regulation applies to all locations where licensees provide services, other than a health care facility licensed by the New Jersey Department of Health.

As of April 18, 2026, a qualified observer must have provided the licensee with documentation of successful completion of the CP-2 training course for as-needed chaperones (or a course of comparable scope and rigor approved by the Board) and a written affirmation that the individual has not been subject to discipline or civil or criminal liability for failure to report misconduct or been convicted of certain disqualifying criminal offenses. An observer may not be a friend or relative of the licensee or the patient, although this does not prevent a patient's friend or relative from being present at the patient's request. A licensee must inform the observer in writing that the observer must remain in the exam room and be free from distractions, maintain a clear line of sight to the examination, report any suspected misconduct to the Board, and that the licensee shall not retaliate against the observer for reporting any suspected misconduct.

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