



February 9, 2023

The National Association of Clinical Nurse Specialists (NACNS) is dedicated to advancing the role and practice of Clinical Nurse Specialists (CNSs). NACNS is committed to advocating for policies that advance health and promote patient access to CNS delivered health care. NACNS believes that a well-constructed Advanced Practice Registered Nurse (APRN) Compact has the potential to enhance licensure portability for APRNs and eliminate the unnecessary geographic variability in access to care that patients currently experience.

APRNs are educated and prepared for full practice without the need for post-license practice hours. Therefore, NACNS cannot support the requirement for 2080 practice hours prior to eligibility for multistate license. This requirement directly conflicts with the evidence that APRNs are prepared to safely practice from the point of graduation and passage of a national certification board examination. This requirement creates a new and unnecessary national barrier that was not present in prior versions of the APRN Compact and is especially problematic in states that have not adopted practice hours requirements or are working to retire them.

Additionally, the current APRN Compact presents a specific concern for the APRN roles that prescribe controlled substances in the care of patients. The inclusion of the practice hour requirement coupled with how the APRN Compact intersects with controlled substances further entrenches challenges that the APRN community has been working to eliminate.

Finally, it is imperative that the APRN Compact include a formal mechanism to ensure practicing APRNs are represented among the APRN Compact administrators.

For these reasons, NACNS opposes the adoption of the APRN Compact as currently written.

Respectfully,

A handwritten signature in black ink that reads "Phyllis Whitehead". The signature is written in a cursive, flowing style.

Phyllis Whitehead, PhD, APRN/CNS, ACHPN, PMGT-BC, FNAP, FAAN
NACNS President