



March 22, 2022

The Honorable Shane E. Pendergrass  
Chair, House Health and Government Operations Committee  
Room 241, House Office Building  
Annapolis, MD 21401-1991

**RE: SB 513 – Health Occupations – Clinical Nurse Specialists – Prescribing Authority – Letter of Support with Amendments**

Dear Chair Pendergrass and Committee Members:

The Maryland Board of Nursing (the Board) respectfully submits this letter of support with amendments for Senate Bill (SB) 513 – Health Occupations – Clinical Nurse Specialists – Prescribing Authority. This bill defines “clinical nurse specialist” and “practice as a clinical nurse specialist” for the purpose of authorizing clinical nurse specialists to prescribe drugs and durable medical equipment under regulations adopted by the State Board of Nursing; alters the definition of “authorized prescriber” for purposes of the Maryland Pharmacy Act; and authorizes a licensed physician to personally prepare and dispense a prescription.

Clinical Nurse Specialists (CNSs) are advanced practice registered nurses (APRNs) who use their expertise to assess, diagnose, treat, and manage patients of all health complexities. CNSs must be licensed registered nurses (RNs) with graduate preparation (Master’s or Doctorate) from an accredited clinical nurse specialist program. The current standards of practice for CNSs allow them the flexibility to serve the pediatric, geriatric, and women’s health population; to practice in critical care or emergency room settings; to assess psychiatric evaluations or rehabilitation; and to treat pain, wounds, and stress-related illnesses.

According to the National Council of State Boards of Nursing (NCSBN), 23 states currently allow independent practice for the CNS<sup>1</sup>. A CNS must complete, at a minimum, three separate comprehensive graduate-level courses to exercise prescribing and ordering responsibilities. These courses must include advanced health/physical assessment, advanced physiology/pathophysiology, and advanced pharmacology. Additional research into independent practice of the CNS demonstrates the following outcomes: reduced hospital costs and length of stay, reduced frequency of emergency room visits, improved pain management practices,

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<sup>1</sup> CNS Independent Prescribing Map. National Council of State Boards of Nursing (NCSBN). 2021.

increased patient satisfaction with nursing care, and reduced medical complications in hospitalized patients.<sup>2</sup>

The pandemic has brought many challenges into the healthcare setting, particularly for Marylanders in underserved communities. There have been incredible limitations for healthcare practitioners in being able to provide adequate and expeditious care. The Board believes it is essential to authorize CNSs to practice to the full extent of their education and training. Allowing CNSs the ability to practice independently and autonomously would provide an additional avenue, among other solutions, to increase access to healthcare services for all Marylanders.

The Board, however, respectfully submits the following amendment to broaden language referring to an advanced practice registered nurse (APRN) with prescriptive authority. Health Occupations Article Title 8 currently authorizes certified nurse practitioners and certified nurse midwives to have prescriptive authority. The bill's current reference to § 8-508 and § 8-514 limit the authority afforded to current practitioners.

On page 4. Section 12-101. Lines 1 – 2.

“...authority under [§ 8-508 **OR § 8-514**] **TITLE 8** of this article...”

On page 4. Section 12-102. Lines 8 – 9.

“...**AN ADVANCED PRACTICE REGISTERED NURSE WITH PRESCRIPTIVE AUTHORITY UNDER [§ 8-508 OR § 8-514] TITLE 8** of this article...”

For the reasons discussed above, the Board of Nursing respectfully submits this letter of support with amendments for SB 513.

I hope this information is useful. For more information, please contact Iman Farid, Health Policy Analyst, at (410) 585 – 1536 ([iman.farid@maryland.gov](mailto:iman.farid@maryland.gov)) or Rhonda Scott, Deputy Director, at (410) 585 – 1953 ([rhonda.scott2@maryland.gov](mailto:rhonda.scott2@maryland.gov)).

Sincerely,



Gary N. Hicks  
Board President

**The opinion of the Board expressed in this document does not necessarily reflect that of the Department of Health or the Administration.**

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<sup>2</sup> Impact of the Clinical Nurse Specialist Role on the Costs and Quality of Health Care. National Association of Clinical Nurse Specialists (NACNS).