



“Advocating for NPs since 1992”

February 2, 2024

Bill: HB 425 Advanced Practice Registered Nurse Compact
Position: OPPOSE

The Nurse Practitioner Association of Maryland (NPAM) advocates for the approximately 800 nurse practitioner members and the over 8,000 Nurse Practitioners licensed to practice in Maryland for policies and regulations that protect and enable nurse practitioners to provide accessible and high-quality healthcare. Compacts are intended to make practicing in one’s home state and elsewhere, easier. However, this APRN Compact creates unnecessary burdens.

NPAM opposes HB 425 for the following reasons:

NPAM strongly opposes the inclusion of 2,080 practice hours as a prerequisite for a multistate APRN Compact license. The inclusion of practice hours is inconsistent with the evidence and is in direct conflict with the Consensus Model for APRN Regulation which addresses licensure, accreditation, certification and education, and sets a dangerous precedent. This regulatory model has been universally accepted since 2005 and fully implemented in Maryland in 2015. Why deviate from it?

- o Nurse practitioners have no current hour requirement and are safe to practice following graduation and successful passage of their national certification exams.
- o A post-graduation practice hour requirement as an APRN multi-state licensure requirement poses a challenge to workforce development during a time of healthcare workforce shortage. Many states with similar requirements have expressed difficulty recruiting and retaining nurse practitioners.

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This compact will create new barriers to providing care in Maryland. In contrast to Maryland's allowance of full practice authority for nurse practitioners, the APRN Compact noticeably excludes controlled substances. Nurses in the compact providing telehealth visits would have to comply with the prescribing privileges of the specific state where the patient is physically. If that state does not allow NP's to prescribe controlled substances such as ADHD (Attention Deficit Hyperactivity Disorder) medications forcing the patient to go elsewhere to get the medication they need.

- The Compact provides that the APRN Compact Administrators are composed of the head of each participating state licensing board or that person's designee. It is unacceptable that said Board would not include an APRN. It is essential that the compact administrators have a full understanding of the role of an APRN.

- Licensure fees will most certainly shift, and it is unknown how this will impact the Maryland Board of Nursing (MBON) fiscally and the cost of the Compact Administration Fee. Administratively, the MBON is already overburdened with work, as is indicated in the long license renewal wait times, and backlog of investigations. As reported by the MBON, at the end of FY 2023 there were 6,269 outstanding investigations, including 1,203 in 2023. It is unknown what impact this APRN Compact will have on the MBON.

NPAM has been at the table but a compromise cannot be met when the language cannot change.

- Compact legislation must be voted on as-is. It **CANNOT** be altered to address our concerns. Neither will adding enabling language. All compact party states will have to submit the legislation to both chambers, pass the legislation without amendments, and be signed by the governor. This process will need to be repeated in all member states.

NPAM respectfully requests that you press PAUSE on this initiative.

- NPAM looks forward to supporting a Compact that will bolster workforce development, reduce patient care costs and barriers to care, without restricting NP practice, and allowing NP's a seat at the table regulating it.

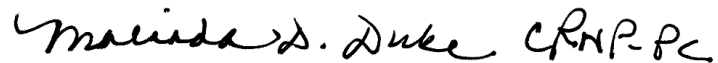
- There is no rush to pass this compact. It would not take effect until seven states pass it. Currently, only three states (Delaware, North Dakota, and Utah) have passed it as of 2/1/2024. No states where it was introduced in 2023 passed it into law.

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30 organizations including NPAM submitted letters to the NCBN asking to meet about a Compact. The NCBN declined to meet and approved resubmitting the current Compact.

NPAM supports compact legislation generally, but with the inability to change the language in the introduced legislation, NPAM respectfully requests an unfavorable vote on HB 425.

If you have any questions, please contact me.
Sincerely,

A handwritten signature in black ink that reads "Malinda S. Duke CRNP-PC". The signature is written in a cursive style.

Malinda Duke CRNP
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