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May 10, 2018

Katherine Thomas, MN, RN, FAAN
President
National Council of State Boards of Nursing
111 East Wacker Drive
Suite 2900
Chicago, IL 60601

Dear Ms. Thomas:

The undersigned organizations, representing national specialty and state medical societies, are writing to request that the National Council of State Boards of Nursing (NCSBN) reconsider certain provisions of the Advanced Practice Registered Nurse Compact (APRN Compact) that alter state laws related to the scope of practice of APRNs.

We fully support efforts to streamline and modernize licensure for physicians and other health care professionals. In fact, many of the undersigned organizations support the Interstate Medical Licensure Compact. In addition, many of the undersigned organizations have supported or have taken a neutral position on legislation to enact other health professional licensure compacts, including the Nurse Licensure Compact, PSYPACT and the Physical Therapy Licensure Compact. These compacts have a few critical things in common. Specifically, none of these compacts alter scope of practice laws, and all of them have enjoyed widespread success in state legislatures.

Of the health professional licensure compacts in existence, the APRN Compact is the only compact that changes the health professional's scope of practice. As a result, the APRN Compact is the only health professional licensure compact that the undersigned organizations have challenged. We strongly object to the use of interstate licensure compacts as a mechanism through which to expand scope of practice laws, and call on NCSBN to reconsider inclusion of the relevant sections.

Specifically, we ask that NCSBN remove or substantially revise APRN Compact Article III, Sections (f) and (h), which grant prescriptive authority and allow APRNs to practice independent of a supervisory or collaborative relationship with a physician, notwithstanding state law to the contrary.

Were NCSBN to revise the APRN Compact to align with the other health professional licensure compacts to focus on the APRN Compact's stated goal of facilitating license portability for APRNs, many of the undersigned organizations would consider support of or neutrality on APRN Compact legislation. We sincerely hope you will keep this consideration in mind as your Annual Meeting approaches.

Please contact Kristin Schleiter, JD, Senior Legislative Attorney, Advocacy Resource Center, at kristin.schleiter@ama-assn.org or (312) 464-4783 with any questions or comments.

American Medical Association
Medical Association of the State of Alabama
Arizona Medical Association
Arkansas Medical Society
California Medical Association
Colorado Medical Society
Connecticut State Medical Society

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Medical Society of Delaware
Medical Society of the District of Columbia
Florida Medical Association Inc
Medical Association of Georgia
Hawaii Medical Association
Illinois State Medical Society
Indiana State Medical Association
Kansas Medical Society
Kentucky Medical Association
Louisiana State Medical Society
Maine Medical Association
MedChi, The Maryland State Medical Society
Massachusetts Medical Society
Michigan State Medical Society
Minnesota Medical Association
Mississippi State Medical Association
Missouri State Medical Association
Montana Medical Association
Nebraska Medical Association
Nevada State Medical Association
New Hampshire Medical Society
Medical Society of New Jersey
New Mexico Medical Society
Medical Society of the State of New York
North Carolina Medical Society
North Dakota Medical Association
Ohio State Medical Association
Oklahoma State Medical Association
Pennsylvania Medical Society
Rhode Island Medical Society
South Carolina Medical Association
South Dakota State Medical Association
Tennessee Medical Association
Texas Medical Association
Utah Medical Association
Vermont Medical Society
Medical Society of Virginia
Washington State Medical Association
West Virginia State Medical Association
Wisconsin Medical Society
American Academy of Allergy, Asthma & Immunology
American Academy of Child and Adolescent Psychiatry
American Academy of Dermatology Association
American Academy of Facial Plastic and Reconstructive Surgery
American Academy of Family Physicians
American Academy of Ophthalmology

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American Academy of Orthopaedic Surgeons
American Academy of Otolaryngology—Head and Neck Surgery
American Academy of Physical Medicine and Rehabilitation
American Academy of Otolaryngic Allergy
American Association of Hip and Knee Surgeons
American Association of Neurological Surgeons
American Association of Orthopaedic Surgeons
American College of Allergy, Asthma and Immunology
American College of Emergency Physicians
American College of Physicians
American College of Radiation Oncology
American College of Radiology
American College of Surgeons
American Osteopathic Association
American Society for Dermatologic Surgery Association
American Society of Anesthesiologists
American Society of Cataract and Refractive Surgery
American Society of Dermatopathology
American Society of Echocardiography
American Society of Plastic Surgeons
American Urological Association
Congress of Neurological Surgeons
Florida Osteopathic Medical Association
Heart Rhythm Society
International Society for the Advancement of Spine Surgery
National Association of Spine Specialists
North American Spine Society
Renal Physicians Association
Society of Nuclear Medicine and Molecular Imaging
Spine Intervention Society