

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](mailto: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

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

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