



Board of Nursing

Larry Hogan, Governor · Boyd K. Rutherford, Lt. Governor · Dennis R. Schrader, Secretary

February 17, 2022

The Honorable Delores G. Kelley
Chair, Senate Finance Committee
3 East Miller Senate Office Building
Annapolis, MD 21401-1991

RE: SB 380 – Public Health – Emergency and Allergy Treatment Programs – Nurse Practitioners – Letter of Support with Amendments

Dear Chair Kelley and Committee Members:

The Maryland Board of Nursing (the Board) respectfully submits this letter of support with amendments for Senate Bill (SB) 380 – Public Health – Emergency and Allergy Treatment Program – Nurse Practitioners. This bill authorizes nurse practitioners to prescribe and dispense auto-injectable epinephrine to certain certificate holders who operate youth camps.

Certified Registered Nurse Practitioners (CRNPs), under Maryland Annotated Code’s Health Occupations Articles §8-508 and §8-512, are “authorized to prescribe, personally prepare, and dispense drugs”. The Code of Maryland Regulations (COMAR) Subtitle 27, additionally allows CRNPs to “independently prescribe, personally prepare, and dispense any drug that is authorized to be prescribed in the course of treating a patient”.^{1,2}

In order to be certified to practice in the state of Maryland, CRNPs are required to complete a master’s or doctoral degree program and have clinical training beyond their initial registered nurse (RN) preparation. Didactic and clinical courses prepare CRNPs with specialized knowledge and clinical competency to practice in primary care, acute care, and long-term health care settings. To be recognized as an independent practitioner with full practice authority, CRNPs must undergo rigorous national certification, periodic peer review, and clinical outcome evaluations.

The Board is in strong support of expanding a CRNPs authority to prescribe and dispense auto-injectable epinephrine to the youth camp setting. The Board believes early epinephrine administration to be critical for individuals who suffer from severe adverse

¹ [COMAR 10.27.07.03](#) Nurse Practitioner – Scope and Standards of Practice

² [COMAR 10.27.07.07](#) Preparing and Dispensing

reactions/anaphylaxis. Allowing CRNPs the ability to prescribe this medication directly to the camp will increase access to this life-saving medication for children.

To stay in compliance with Title 8 of the Health Occupations Article, the Board is requesting to amend the title of NURSE PRACTITIONER TO **REGISTERED** NURSE PRACTITIONER within the legislative language. An example has been provided below your review.

Section 13-701. On page 1. Line 20. Add:

“...insect stings when physician [services], **REGISTERED** NURSE PRACTITIONER, or emergency medical...”

Section 13-702. On page 2. Lines 19 – 22.

(G) “**REGISTERED** NURSE PRACTITIONER” **HAS THE MEANSING STATED IN §8-101**
~~AN INDIVIDUAL LICENSED TO PRACTICE REGISTERED NURSING IN THE STATE~~
~~AND WHO IS CERTIFIED AS A NURSE PRACTITIONER BY THE STATE BOARD OF~~
~~NURSING UNDER TITLE 8 OF THE HEALTH OCCUPATIONS ARTICLE.~~

For the reasons discussed above, the Board of Nursing respectfully submits this letter of support with amendments for SB 380.

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