



# Board of Nursing

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

Amy Hicks, Board President | Karen Evans, Executive Director  
4140 Patterson Ave, Baltimore, MD 21215

March 30, 2022

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

**RE: SB 380 – Public Health – Emergency and Allergy Treatment Program – Nurse Practitioners – 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) 380 – Public Health – Emergency and Allergy Treatment Program – Nurse Practitioners. This bill authorizes certain nurse practitioners to prescribe and dispense auto-injectable epinephrine to certain certificate holders who operate youth camps.

Certified Registered Nurse Practitioners (CRNPs), pursuant to the Annotated Code of Maryland 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 permits CRNPs to “independently prescribe, personally prepare, and dispense any drug that is authorized to be prescribed in the course of treating a patient.”<sup>1,2</sup>

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 professional 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 authority for CRNPs to prescribe and dispense auto-injectable epinephrine in the youth camp setting. Timely administration of epinephrine is critical for individuals who suffer from severe adverse reactions and anaphylaxis. Authorizing

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<sup>1</sup> COMAR 10.27.07.03 Nurse Practitioner – Scope and Standards of Practice

<sup>2</sup> COMAR 10.27.07.07 Preparing and Dispensing

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CRNPs the ability to prescribe this medication directly to the certificate holder will increase access to this life-saving medication for children in distress.

The Board respectfully submits the following amendments to amend the title of nurse practitioner to **registered** nurse practitioner to stay compliant with Title 8 of the Health Occupations Article.

Section 13 – 702. On page 2. Line 23.

**(G) “REGISTERED NURSE PRACTITIONER”...**

Section 13 – 705. On page 2. Line 30.

(a) (1) A **REGISTERED NURSE PRACTITIONER OR A** physician licensed to practice...

Section 13 – 705. On page 3. Line 1.

(2) A **REGISTERED NURSE PRACTITIONER,** A pharmacist licensed to practice pharmacy...

Section 13 – 705. On page 3. Lines 5 – 6.

(1) On presentment of a certificate, receive from any **REGISTERED NURSE PRACTITIONER OR ANY** physician licensed to practice...

Section 13 – 705. On page 3. Line 11.

(c) In an emergency situation when **REGISTERED NURSE PRACTITIONER,** physician...

Section 13 – 707. On page 3. Lines 30 – 31.

**(3) A CAUSE OF ACTION MAY NOT RISE AGAINST ANY REGISTERED NURSE PRACTITIONER FOR ANY ACT OR OMISSION WHEN THE REGISTERED NURSE PRACTITIONER IN...**

Section 13 – 707. On page 4. Line 3.

...by common law to which a volunteer, **REGISTERED NURSE PRACTITIONER,** physician..

For the reasons discussed above, the Board of Nursing respectfully submits this letter of support with amendments for SB 230.

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,

A handwritten signature in black ink, appearing to read 'G. Hicks', with a long horizontal stroke extending to the left.

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.**