Our firm represents the Vermont Nurse Practitioners Association (the "VNPA"). Per my conversation with Sen. Ayer this morning, it has been brought to the VNPA's attention that the current language in H.241 leaves out a subset of APRN's who are licensed as a clinical nurse specialists. The current language uses the term "advanced practice registered nurse licensed by the Vermont Board of Nursing as a nurse practitioner in psychiatric nursing", which is one of two types of licenses for APRNs. The VNPA would recommend striking the words "as a nurse practitioner". This would allow both types of APRNs to order EIPs, while still requiring that an APRN be licensed in psychiatric nursing in order to do so.

We have discussed this technical change with both the Vermont Association of Hospitals and Health Systems and the Department of Mental Health. I don't believe that either will have any objection to this proposed change.

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