

**Department of Health**  
Board of Medical Practice  
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*Agency of Human Services*

February 9, 2010

Mary L. Botter, PhD, RN  
Executive Director  
Vermont Board of Nursing  
Office of Professional Regulation  
National Life Building, North, FL 2  
Montpelier, VT 05620-3402

Dear Mary:

On February 3, the Vermont Board of Medical Practice discussed the Board of Nursing's January 11, 2010 draft amended administrative rules on Advanced Practice Registered Nurse (APRN) practice and licensure.

The Board voted to support the enclosed comments of the Vermont Medical Society which also underscore the six recommendations which made by the Board of Medical Practice in January, 2008. A copy of those earlier Board recommendations is also enclosed.

One of the Vermont Medical Society's general recommendations is that, before recommending elimination of the requirement for collaborative practice for certified nurse midwives (CNMs), certified registered nurse anesthetists (CRNAs) or other clinical nurse specialists, the Board of Nursing, Board of Medical Practice, and the Board of Pharmacy should convene a task force to review the consequences of making such changes. The Board of Medical Practice would be glad to serve on such a task force.

Thank you for the opportunity to comment.

Sincerely,



William E. Wargo, Director

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cc:  Board Members  
 Vermont Medical Society

