



Susan Reilly
President

Monica Rodgers
Secretary

Jean Sauget
Treasurer

To the Senate Health and Social Services Committee;

As president of the Alaska Alliance for Retired Americans, I write today in opposition to SB67, the "Multistate Nurse Licensure Compact."

The members of the Alaska Alliance object to this bill for three major reasons: First and foremost, this bill is bad for patient safety. Retirees depend on the stringent standards of the Alaska Board of Nursing to make sure that the professionals caring for us are trained to the highest standards and maintain those high standards through continuing education. This bill would reduce that oversight and leave Alaska retirees vulnerable to substandard care.

Second, the bill purports to help solve a challenge with a shortage of nurses. This shortage is not specific to Alaska; it is a nationwide shortage. Even with the nationwide shortage, over 40% of the nurses currently licensed in the state claim residency elsewhere, so nurses are already coming here and practicing with today's licensing laws. This bill will not address the staffing challenges. Rather than reducing oversight and relinquishing control over our high standards, the Legislature should consider ways to encourage more Alaskans to become nurses, by expanding educational opportunities here in the state.

Third, in this time of budget constraints, this bill would cost the state money. Not only will the state lose the licensing fees of nurses coming here to practice under this new law, the "Nurse Licensure Compact" will charge the state for participating, with that money going, not to our own Board of Nursing, to enforce our high standards, but to a private organization outside the state.

We urge you to stand with Alaska's growing numbers of retirees and reject this bill.

I remain,
Cordially yours,

Susan Reilly,
President, Alaska Alliance for Retired Americans.

Jody Simpson

From: Susan Reilly [REDACTED]
Sent: Wednesday, February 24, 2021 4:54 PM
To: Senate Health and Social Services
Subject: SB67
Attachments: SB67 Opposition Letter.docx

Please include the attached in the documents for SB67, pertaining to the proposal to join the multi-state nursing licensure compact.

Cordially,
Susan Reilly
President, Alaska Alliance for Retired Americans



To: Sen. David Wilson, Chair of the Senate Health & Social Services Committee

From: Joelle Hall, President of the Alaska AFL-CIO

CC: Sen. Shelley Hughes, Sen. Mia Costello, Sen. Lora Reinbold, Sen. Tom Begich

Date: February 25, 2021

Subject: SB 67 - NURSING: LICENSURE; MULTISTATE COMPACT

The Alaska AFL-CIO opposes SB 67 on the following grounds:

Loss of state sovereignty: Alaskans know what's best for Alaska. Under our current system, key decisions regarding nursing standards and regulations are made by Alaskans for Alaskans. SB 67 would cede local control and force Alaska to adopt standards and regulations put in place by an "Interstate Commission" that does not have the best interest of our state in mind. This "Interstate Commission" is the National Council of State Boards of Nursing (NCSBN), a private, Chicago-based trade association. And as a result, the quality of care for Alaskans would decrease.

Decrease in quality of care: Alaska has rigorous licensure requirements for nurses, which are necessary for providing the quality of care many Alaskans need and deserve. Uniform licensure requirements under the National Council of State Boards of Nursing are less stringent than the current Alaska state licensing requirements. Alaska also has strong license renewal requirements and the ability to update and amend as needed. Under the Compact, license renewal requirements would be controlled by the state that issues the Compact license.

Threat to public safety: The Alaska Board of Nursing protects the health and safety of the public by regulating the practice of nursing in our state. Each state has different criteria for evaluating fitness to practice in regards to criminal background. Compact licensure requirements state that nurses must have no state or federal felony convictions, nor have any misdemeanor convictions related to the practice of nursing. However, felony offense statutes are not standardized across states. What constitutes a misdemeanor in one state may be classified as a felony under Alaska law. Yet, the State of Alaska would no longer have the ability to bar that nurse from coming to Alaska and caring for patients in our state.

Will not solve the workforce shortage it aims to address- anti- local hire: The nursing shortage exists nationwide, and joining the Compact will not cause nurses to stream to Alaska. As it stands already, forty-one percent of nurses licensed in Alaska live out-of-state. Instead, we should focus on training and retaining our own Alaska nurses,.

February 24, 2021

The Honorable David Wilson
Chair of the House Health & Social Services Committee
State Capitol
Juneau, AK

RE: Senate Bill 67: NURSING: LICENSURE; MULTISTATE COMPACT

Dear Senator Wilson:

My name is Stacey Sever, BSN RN. I am writing this letter as I am not able to testify in person as I am currently on duty at one of the local hospitals. I have been a nurse in the State of Alaska for almost 23 years. I have held a variety of roles in my profession: Certified Emergency Department Nurse and Nurse Educator, Flight Nurse, and currently a Certified Clinical Documentation Specialist in the Quality/Performance Improvement Department. As you are aware, healthcare is highly regulated in order to ensure the quality of care given and received by members of our community to prevent harm and to decrease morbidity and mortality. Many weeks, months and years of research and clinical trials are carried out to determine which processes/interventions provide the best care outcomes for our patients.

I am opposed to SB 179 Nursing: Licensure; Multistate Compact for many reasons. One of those include the lack of evidentiary support that it will increase nurse staffing needs. Since I started working in healthcare, back in the mid 1980's, there is frequently been a nursing shortage. The introduction of the Nurse Licensure Compact (NLC) has not solved that issue and there continues to be a nationwide nursing shortage. According to the American Association of Colleges of Nursing, "The U.S. is projected to experience a shortage of Registered Nurses (RNs) that is expected to intensify as Baby Boomers age and the need for health care grows." <https://www.aacnnursing.org/news-information/fact-sheets/nursing-shortage> The nursing shortage is multifactorial: aging population of patients, nurses retiring, and low nursing school applications are just to name a few. There are many evidenced based studies that correlate insufficient nurse staffing levels with poor patient outcomes, but the states that are currently part of the NLC have not demonstrated any level of improvement with staffing or patient outcomes despite claims of doing so.

Another reason that I oppose SB 179 is that Alaska has maintained a high level of quality, education and safety of nursing practice through its Alaska State Board of Nursing (BON) which includes the nurse to maintain two of either 30 contact hours of continuing education, 60 hours of uncompensated professional activity, or 320 working hours in the previous two years for nursing license renewal. Idaho, which is a NLC state, only requires a renewal fee and nothing more. Quality and safe care is at the core of nursing in Alaska and it is reflected through the regulations of our nurse practice act. In order to maintain that high level of quality, the licensing and regulatory process must be financially solvent. The NLC will incur lost revenue for the State of Alaska, which is currently under the strain from decreased resource income. This loss in revenue will result in an increase shift of cost burden to the potential smaller pool of nurses in Alaska that do not hold a compact licensure and/or result in decreasing the quality, education, and safety requirements for nurses. This will, in turn, have a potentially detrimental effect on the community that we care for...which could be a family member of yours.

I am asking that you vote against SB 179 Nursing: Licensure; Multistate Compact. I have indicated two of the many reasons above why this legislation would have more risks than benefits to Alaskans and has the potential to lower revenue, quality of care and educational requirements for Alaska Nurses, not to mention any other unintended consequences that may arise.

Thank you for taking the time to hear my deep concerns about the implications of the Nurse Licensure Compact on Alaska nurses. This is clearly not in the best interest of the citizens of Alaska and will have far reaching implications for both the local community and state-wide level.

Sincerely,

Stacey Sever, BSN RN CCDS

[REDACTED]

Anchorage AK 99516

[REDACTED]

Beth Farnstrom, RN, BSN

Anchorage, AK 99516

February 25, 2021

Dear Members of the Senate Health & Social Services Committee,

I oppose SB 67.

I am an RN with over 40 years of nursing practice. 21 years of my nursing career has been in Alaska. I have been watching the evolution of the nurse compact licensure since 2007. The Alaska State Board of Nursing has the right touch nursing regulations that upholds their mission "to actively promote and protect the health of the citizens of Alaska through safe and effective practice of nursing as defined by law".

The nurse license compact (NLC) was originally designed for bordering states to have ease in being licensed in a small geographic area. It is possible for a nurse to live in one state and work in another just by driving a few miles everyday when going to work. Alaska does not border any other state. Looking at the participating states, many of the east and west coast states have not joined the compact.

Of the states that have joined the compact, there is:

- **no** evidence that the compact has decreased or eliminated their nursing shortage
- **no** evidence that joining the compact will guarantee adequate staff and
- **no** evidence that new graduates will stay in a state that is a compact state.

In the supporting document there is reference to highly qualified nurses. In looking at the uniform licensing requirements that all compact states must agree upon, there are less requirements than Alaska presently has in regulations for renewing a nurses license. Does Alaska really want to lower our present standards? NLC requirements vs. Alaska requirements has some inaccurate information. It says that AK does not require an English test but this is not true. 12 AAC 44.290(a)(3)(D) requires foreign educated nurses to take an English proficiency test. Alaska DOES require a criminal background check on everyone licensed in Alaska in regulation 12 AAC 44.319. Alaska does not offer an alternative to discipline program. An Alaskan nurse would have been disciplined for an infraction and reported to NURSUS. NURSUS is a national registry for nurses having disciplinary actions but unfortunately not all compact states participate. This is a lower standard than Alaska has.

Alaska should want to hire Alaska nurses first. Why open the door for possible competition of out of state nurses? With the passage of this Bill, you are supporting out of state licensed nurses to work in Alaska. They will not contribute to the Alaska economy because they do not live here? There is also the risk that there could be more nurses who choose to go work in another compact state. Is this really what is good for the Alaskans needing nursing care? How would you retain nursing graduates if you are telling them to buy the compact license and go work in another state?

Why does Alaska want to give up our sovereignty? Why would you want to give control to other states to run nursing practice in Alaska? Alaska would not retain total authority over our nursing scope of practice and discipline. Alaska would have to compromise on some issues to join the compact and there may be other changes in the future. Who is this Nurse Licensure Compact? Where do they get their power? Who oversees them? How easy is it to leave the compact should you chose to join? How much does it cost to end the compact? At present it costs \$6,000 a year to

belong to the compact. What do Alaskans get for this \$6,000 a year? This \$12,000 cost for each renewal period would have to be paid by Alaskan nurses in higher renewal fees.

Nursing is a profession that is always needed. There has been an increase in people supplying counterfeit nursing education credentials. Our present Board staff is diligent to verify anyone receiving a nursing license has received a nursing education that is from an accredited nursing education program or if it is a foreign educational program, it has been vetted through an independent verification company. They do an outstanding job but some times this licensing process does take time, but every state has licensing delays.

Every state has a different nursing renewal fee. The Alaska renewal fee is reviewed and modified every 2 years. All expenses to run the Board of Nursing are paid by the Alaska nurse licensees. There is no money from the state. Alaska has one of the highest renewal rates at \$200 for December 1, 2020 to November 30, 2022. If a nurse is working on a compact license in Alaska and would have a discipline problem, the Alaska nurses would pay for this investigation. The total investigative expenses for FY 20 for the BON was \$592,351. The compact licensed nurse does not pay a penny to the AK BON and the BON can not assess the cost of the investigation to the NLC nurse. Here are a few examples of other states renewal licensing fees: Georgia is \$65 for 2 years, Iowa is \$99 for 3 years, Texas is \$68 for 2 years, California is \$190 for 2 years and Indiana is \$50 for 2 years.

The COVID pandemic is an unusual crisis that has/is affecting many industries. There is no way that you can substantiate that the Alaska nurses would not have been so overworked if the compact was in place. Every state was asking for more nurses. If there is another medical emergency for Alaska, there are ways to get nurses licensed in our present regulations. This was tested several years ago with a respiratory crisis in Bethel. The regulations worked fine to expedite licensing nurses for the crisis. As we are seeing, the Alaska Governor has emergency authority to assist and there are federal emergency orders to help in times of crisis.

As for the military. Military bases are exempt from requiring an Alaska nursing license. If a military spouse works on base, they can work on their current nursing license. The Air Force announced on May 15, 2019 the spouse re-licensure reimbursement program. This policy gives spouses \$500 to reduce the financial burden of licensing in a new state.

Alaska would have no idea how many compact nurses would be working in Alaska. A compact nurse is not required to register in anyway with the State of Alaska. One would assume that the employer would check to make sure the nurse has a current license in some state. Remember that not all nurses work in an institution and could be in the rural areas of our state and we would never know if they had a current compact license. This is a safety concern that all Alaskans do not have to be concerned with if there is no compact.

Letters of support for SB 67 are employers but not the Alaska Nurses Association. Nurses are going to be affected by this Bill. This is their profession and they know what is best.

I believe in our Alaska State Board of Nursing Statutes and Regulations to keep the public safe. Thank you for the opportunity to share my views on my profession and how this Bill will affect the nursing profession of Alaska. **I oppose SB 67.**

Alaska State Capitol
120 4th St.
Juneau, Alaska 99801

Dear Members of the Senate Health and Social Services Committee:

As an Alaskan nurse, I am writing to voice my opposition to Senate Bill 67 (Nurse Licensure Compact). Having grown up in Kodiak and trained as a nurse through the University of Alaska, Anchorage School of Nursing, I am committed to living and working in in this state and caring for Alaskans. This bill does nothing to aid that work and is likely to cause harm.

I wish I was able to testify in committee today, but I am in clinic administering Covid-19 vaccines. For the record, I oppose this bill because:

- **Senate Bill 67 takes the power of self-governance away from our Alaskan nurses and places it in the hands of Outside for-profit, non-nursing led corporations.** In a year where nurses have shouldered the burden of caring for our communities, neighbors, and family members, the last action the legislature should take is to revoke our capacity to self-govern.
- **Senate Bill 67 shifts the financial burden to nurses.** If we are forced to adopt the Nurse Licensure Compact, the Board of Nursing will no longer be able to collect licensing fees from traveling nurses- but still be stuck with the bill for conducting investigations. The only alternative source of revenue is an increase in licensing fees for Alaskan nurses.
- **Senate Bill 67 is unsafe.** As a nurse, my priority above all else is to provide safe, compassionate care to my patients. The Alaska Board of Nursing supports me in this goal by requiring my license to be up to date and my conduct in compliance with all applicable laws and regulations. This bill places patients at risk because it hobbles the Alaska Board of Nursing's ability to track previous criminal offenses and disciplinary measures for nurses entering our state.

I urge you to pay attention to how few of the letters of support are from nurses practicing in Alaska. Notice the testimony from large, non-nurse related organizations. Reach out to your nurse constituents and ask them how they feel about being forced to join (and pay fees to) a national, non-nurse led licensing company.

As Alaskan nurses continue to work hard to care for Alaskans, I urge you to avoid making our jobs more difficult by adopting unnecessary, harmful legislation. Let us focus on the task at hand- keeping you and your loved ones safe and healthy.

Sincerely,

Molly Carver, RN, BSN



**Alaska Nurses
Association**

3701 East Tudor Road, Suite 208
Anchorage, Alaska 99507
907.274.0827
www.aknurse.org

February 25, 2021

Senator David Wilson
Alaska State Legislature
State Capitol Room 121
Juneau, AK 99801

Dear Senator Wilson,

We are writing on behalf of the Alaska Nurses Association and our 1,500 members in strong opposition to SB 67, the "Multistate Nurse Licensure Compact."

The Alaska Nurses Association (AaNA) is the recognized leader and voice of nurses in Alaska. We work to improve patient safety, achieve safe working conditions, advance professional standards, and provide quality care for our patients and our communities. After careful review and consideration, we believe the current risks of joining the Nurse Licensure Compact are too great for the State of Alaska.

Alaska currently enjoys complete autonomy over the regulation of the profession of nursing, allowing local experts to make local decisions that are best for our state. Created by a private Chicago-based trade association, the Nurse Licensure Compact is administered by a powerful "Interstate Commission" with the power to adopt binding rules and assess payments from the states. If Alaska adopts the Nurse Licensure Compact, we will have ceded our right to determine and enforce the standards for practice that our policymakers have determined are necessary to protect the public.

The Nurse Licensure Compact also undermines the mission of the Alaska Board of Nursing by posing a threat to public safety. The Compact has no mechanism to monitor nurses coming into Alaska to practice from another participating state. There are also worrisome inconsistencies between states in regard to standards for nurses, including with initial and continuing education, criminal offenses, and disciplinary action. The Compact would allow out-of-state nurses practicing here to circumvent Alaska's high standards, jeopardizing the high-quality care that Alaskans receive. These factors altogether hinder the State's ability to protect the public.

Operational funds for the Alaska Board of Nursing are derived from the collection of application and licensing fees. 45 percent of nurses currently licensed in Alaska are nonresidents. Because Compact nurses would no longer be required to obtain an Alaska nursing license, the Board would see a significant decline in revenue. There are also numerous expenses associated with belonging to the Compact. While the Nurse Licensure



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Association**

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907.274.0827
www.aknurse.org

Compact is a financially advantageous situation for out-of-state nurses and companies, the State of Alaska and its residents would face increased financial burden.

Finally, there remains no evidence to suggest that joining the Nurse Licensure Compact would help with nurse staffing. The nursing shortage exists nationwide, and joining the Compact will not suddenly nor magically bring a flood of nurses to Alaska to fill vacancies at needy facilities.

The Alaska Nurses Association remains committed to working with the Alaska Board of Nursing, Alaska Legislature, and others on effective regulatory measures that are workable and realistic, that offer real solutions, and that respect state sovereignty. None of this, unfortunately, describes the Nurse Licensure Compact. We can and must work toward better approaches that put Alaskans first.

We ask that you stand alongside Alaska's nurses and patients in opposition to joining the Nurse Licensure Compact. For more information, please contact Andrea Nutty, AaNA Programs Director at 907-274-0827 or andrea@aknurse.org.

Sincerely,

Sara Massmann, RN, PCCN
Legislative Co-Chair
Alaska Nurses Association

Shannon Davenport, MSN, RN
Legislative Co-Chair
Alaska Nurses Association

Donna Phillips, BSN, RN
Chair, Labor Council
Alaska Nurses Association

Jane Erickson, RN, CCRN
President, Board of Directors
Alaska Nurses Association