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Lauren Cassedy
Chief of Staff
Florida Department of Health

Dear Ms. Cassedy,

I am writing on behalf of Physicians for Patient Protection (PPP) to bring to your attention serious concerns regarding compliance with Florida statutes governing autonomous Advanced Practice Registered Nurse (APRN) practice.

Florida law permits autonomous APRN practice only within the specialty of primary care, as defined in section 464.0123, Florida Statutes, and Rule 64B9-4.021, Florida Administrative Code. This statutory limitation was a core safeguard of House Bill 607, enacted to ensure patient safety while expanding access to primary care services. However, recent independent research commissioned by PPP raises significant concerns that these statutory requirements are not being consistently enforced.¹

An independent compliance evaluation conducted by Phoenix Consulting Group, in partnership with Physicians for Patient Protection, analyzed publicly available Florida Department of Health licensure data for all active Autonomous APRNs as of October 2025.² This analysis identified **1,731 Autonomous APRNs who were potentially noncompliant with one or more statutory requirements**, excluding duplicates who failed multiple criteria. This represents approximately **11.3% of all practicing Autonomous APRNs in Florida.**²

Specifically, the analysis found that the Florida Board of Nursing has granted autonomous practice status to substantial numbers of APRNs whose certifications do not include training in comprehensive primary care—the only specialty permitted for autonomous practice under Florida law. These include:²

- **924 psychiatric mental health nurse practitioners** without additional primary care certification
- **811 acute care nurse practitioners**
- **103 certified registered nurse anesthetists (CRNAs)**
- **12 neonatal nurse practitioners**

None of these certifications prepare licensees to independently practice primary care, yet autonomous practice authority was nonetheless granted. In addition, the analysis identified **327 APRNs who were granted autonomous licensure despite receiving their initial APRN license less than 1.5 years earlier**, making it logistically implausible for them to have completed the **3,000 physician-supervised clinical hours required by Florida statute.**² These cases raise concerns regarding whether required statutory prerequisites are being adequately verified prior to licensure.

Further compounding these findings, a separate cross-sectional study of autonomous nurse practitioners in Florida found that **59.1% are practicing outside of primary care**, most commonly in psychiatry and cosmetic or non-standard medical practices.³ This study was based on direct contact with autonomous NP practices across the state and provides strong evidence of widespread noncompliance with statutory scope-of-practice limitations.³ Notably, the Florida Board of Nursing has previously acknowledged that autonomous psychiatric practice does not fall within the statutory definition of primary care, yet these practice patterns persist.³

Taken together, these findings raise serious concerns regarding patient safety, statutory compliance, and regulatory oversight. They also call into question proposals for further scope expansion at a time when existing autonomous practice laws are not being consistently enforced. Physicians for Patient Protection respectfully urges the Florida Department of Health to review these findings and to evaluate whether current licensure verification, auditing, and enforcement mechanisms are sufficient to ensure compliance with Florida law. Ensuring that autonomous practice authority is granted and exercised strictly within statutory limits is essential to protecting patients and maintaining public trust.

We would welcome the opportunity to discuss these findings further and to provide additional supporting documentation as needed.

Thank you for your attention to this important matter.

Sincerely,



Sharon L. D'Souza, MD
President
Physicians for Patient Protection

References

1. Florida Statutes §464.0123; Florida Administrative Code Rule 64B9-4.021.
2. Al Asadi F, Rodgers E, Ogu K, et al. *Compliance Evaluation of Autonomous Advanced Practice Registered Nurse Licensure Requirements in Florida*. Phoenix Consulting Group in partnership with Physicians for Patient Protection; January 6, 2026.
3. Bernard R, Shaffer PB, D'Souza SL, et al. Autonomous nurse practitioners in Florida frequently practice outside their legal scope of primary care: a cross-sectional study. *Family Practice*. 2025.