



March 23, 2017

The Honorable Jeanie Riddle
Chairwoman
Missouri State Senate Professional Registration Committee
201 W Capitol Avenue
Room 417
Jefferson City, Missouri 65102

Dear Chairwoman Riddle:

The American Osteopathic Association (AOA) and the Missouri Association of Osteopathic Physicians and Surgeons (MAOPS) are writing to urge you to oppose SB 42. This bill removes virtually all requirements for collaborative practice arrangements between an Advanced Practice Registered Nurse (APRN) and a physician by limiting such arrangements to the delegation of authority to prescribe controlled substances. It also allows for a physician to collaborate with an unlimited number of APRNs. The AOA and MAOPS are very concerned that such a large increase in APRNs' ability to independently deliver health care services, without commensurate increases in education, training and certification competency requirements, may put the health and safety of Missouri patients at risk.

The AOA represents nearly 130,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs/osteopathic medicine can be found at www.osteopathic.org. MAOPS is a professional medical organization that represents nearly 3,000 DOs providing patient care in Missouri.

The AOA and MAOPS support the "team" approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. A health care provider's scope of practice should be directly related to their education, training and competency demonstration requirements.

Osteopathic medical education includes:

- **Four years of medical school**, which includes **two years of didactic study** totaling upwards of 750 lecture/practice learning hours just within the first two years, **plus two more years of clinical rotations** done in community hospitals, major medical centers and doctors' offices.
- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.
- Missouri-licensed physicians must complete **50 continuing medical education hours** per two-year renewal period.

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APRN education includes:

- **A two-year master's degree program** approved by the State Board of Nursing, which may be done online.
- **Approved master's programs** may be done in various population foci and **include some clinical training, but no postgraduate medical education** is required.
- **Missouri does not require any continuing education for APRNs**, except that APRNs who prescribe controlled substances must have completed a **three credit hour course in pharmacology within the previous five years.**

This bill:

- **Removes most requirements for collaborative practice arrangements**, including **geographic proximity** to the collaborating physician and the **mandate that an APRN submit at least 10% of his or her charts to the physician for review every 14 days.**
- **Limits collaborative practice arrangements to the delegation of authority to prescribe controlled substances.**
- **Removes limitations on the number of APRNs** with whom a **physician may enter into a collaborative practice arrangement.**
- **Removes the requirement that APRNs must practice for at least a month with the collaborating physician continuously present** before practicing without the physician present.

Eliminating physician involvement and expanding APRNs' authority to independently provide health care services without appropriate increases in training and competency demonstration could place patient safety and the public at risk. **We urge you to protect the safety of Missouri's patients by opposing SB 42.** Should you need any additional information, please feel free to contact Nicholas A. Schilligo, MS, AOA Associate Vice President of State Government Affairs, at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



Boyd R. Buser, DO
President, AOA



Jeff Davis, DO
President, MAOPS

CC: Mark A. Baker, DO, AOA President-elect
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