



February 27, 2017

Members of the House of Representatives
2300 N. Lincoln Boulevard
Oklahoma City, Oklahoma 73105

Dear Representatives:

The American Osteopathic Association (AOA) and the Oklahoma Osteopathic Association (OOA) are writing to strongly encourage you to oppose HB 1013. This bill expands the scope of practice for Advanced Practice Registered Nurses (APRNs) by giving them full practice rights equivalent to physicians and surgeons. It also eliminates the requirement that they practice pursuant to a collaborative practice agreement with a physician and allows them to independently establish diagnoses and prescribe medications, including controlled substances, without requiring them to attain a level of education or competency similar to a physician. The AOA and OOA are very concerned that such a large increase in scope of practice for APRNs, without commensurate increases in education, training or certification competency requirements, may put the health and safety of Oklahoma's 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. The OOA is a professional medical organization representing over 2,000 DOs in Oklahoma.

The AOA and AOMA 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. While we value the contributions of all health care providers to the health care delivery system, we believe any expansion of APRN authority to provide services to patients without appropriate oversight should be directly related to additional education, training and competency demonstration requirements. APRN education and training lacks the comprehensive and robust requirements needed to safely provide patients with a full range of unsupervised primary care services.

Osteopathic physicians complete four years of osteopathic medical school, which includes two years of didactic study and two years of clinical rotations. Clinical rotations in the third and fourth years are done in community hospitals, major medical centers and doctors' offices. This is followed by 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.

Physicians have both extensive medical education and comprehensive training that prepare them to understand medical treatment of disease, complex case management and safe prescribing practices.

In addition, Oklahoma requires that osteopathic physicians complete 60 hours of strenuous continuing education requirements every three years.¹ AOA board certified physicians participate in Osteopathic Continuous Certification, a process that ensures that board certified DOs maintain currency and demonstrate competency in their specialty area. It includes lifelong learning and continuous education, cognitive assessment and practice performance and assessment.

By comparison, this bill would permit certain nurses who have completed an approved two-year master's degree (which may be done online, and is approved by the Oklahoma Board of Nursing) with coursework in pharmacotherapeutics, clinical application and use of pharmacological agents, to independently provide a full range of primary care services, establish diagnoses, and prescribe controlled substances. Approved master's programs include some clinical training, but no postgraduate medical education is required. The Board of Nursing is also charged with defining minimal requirements for renewal of prescriptive authority, to include 15 contact hours in the above areas every two years.

Expanding the scope of practice for APRNs and eliminating physician involvement without commensurate increases in education and training could place patient safety and the public at risk. To protect the public's health and safety, health professionals' scope of practice must be based on their level of training, education, experience and examination. **We urge you to protect the safety of Oklahoma's patients by opposing HB 1013.** Should you need any additional information, please feel free to contact Nick Schilligo, MS, Associate Vice President, State Government Affairs at nshelligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



Boyd R. Buser, DO
President, AOA



Gabriel M. Pitman, DO
President, OOA

CC: Mark A. Baker, DO, AOA President-elect
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¹ See <http://www.okmedicalboard.org/cme/CMEguidelines.pdf>.