



AMERICAN OSTEOPATHIC ASSOCIATION

TREATING OUR FAMILY AND YOURS



March 10, 2017

The Honorable James C. Sheehan
Rhode Island State Senate Committee on Health and Human Services
85 Smith Street
Providence, Rhode Island 02903

Dear Senator Sheehan:

The American Osteopathic Association (AOA) and the Rhode Island Society of Osteopathic Physicians and Surgeons (RISOPS) are writing to oppose S 326. This bill relates to behavioral health care and the state's mental health law. It expands the scope of practice for Advanced Practice Registered Nurses (APRNs) certified in psychiatric/mental health by allowing them to replace physicians throughout the law without specifying any additional education, training and competency demonstration requirements. The AOA and RISOPS are very concerned that such a large increase in scope of practice for APRNs, without requiring them to attain similar education, training or certification competency to a physician, may put the health and safety of Rhode Island 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. RISOPS is a professional organization that represents over 300 DOs providing patient care in Rhode Island.

The AOA supports 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. Any increase in APRN scope of practice should be directly related to additional 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.

- **Strenuous continuing education requirements** for AOA board certified physicians, who participate in Osteopathic Continuous Certification. This process includes lifelong learning and continuous education, cognitive assessment and practice performance and assessment in order to ensure that board certified DOs maintain currency and demonstrate competency in their specialty area. Rhode Island-licensed physicians must complete **40 continuing medical education hours per two-year renewal period.**

APRN education includes:

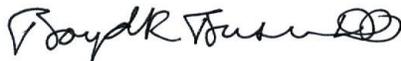
- **A two-year master's degree program**, which may be done online, and is approved by the State Board of Nursing.
- **Approved master's programs** may be done in various population foci (including psychiatric/mental health) and **include some clinical training, but no postgraduate medical education** is required.
- Rhode Island-licensed APRNs must complete **10 hours** of continuing education **every two years.**

This bill would allow an APRN certified in psychiatric/mental health to replace a physician throughout the mental health law, as follows:

- An APRN may **examine a person** and **apply for the emergency certification of that person** at an appropriate facility.
- An APRN at a receiving facility may **conduct a preliminary evaluation and examination of an admitted person.**
- **A court may order a person to be examined by an APRN.**
- An APRN may **develop and implement an individualized treatment plan for a patient.**

Eliminating physician involvement and expanding the scope of practice for APRNs without appropriate increases in education and training could place patient safety and the public at risk. **The AOA and RISOPS urge you to ensure that fully trained and licensed professionals are adequately involved in patient care by opposing S 326.** 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,



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President, AOA



Gregory G. Allen Jr., DO
President, RISOPS

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