



TO: Members of the Maine State Joint Health Coverage, Insurance and Financial Services Committee

FROM: American Osteopathic Association
Maine Osteopathic Association
Spectrum Healthcare Partners

DATE: February 18th, 2021

SUBJECT: LD 295, *An Act To Repeal Restrictions That Prohibit Certain Advanced Practice Registered Nurses from Providing Essential Health Care Services*

On behalf of the undersigned organizations, we are writing to express strong concerns regarding LD 295. This bill eliminates the requirement that a certified nurse practitioner (CNP) must practice for a minimum of 24 months under physician supervision (or under the supervision of a nurse who previously practiced under physician supervision or be employed by a clinic or hospital that has a physician medical director) before practicing independently. We are concerned that such a large increase in scope of practice for CNPs, without any increases in education, training or competency demonstration requirements, could put the health and safety of Maine's patients at risk.

LD 295 does not present an administrative change to existing practices. Instead, it proposes the elimination of substantive clinical training requirements that are necessary and important for ensuring quality patient care. Eliminating any physician oversight of the practice of medicine is an overly broad solution that could jeopardize patient safety. **We strongly advocate for 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.** Physicians across the United States must meet the same education, training and testing requirements that afford progressively greater autonomy before becoming licensed to treat patients on their own. While we value the contributions of all healthcare providers to the healthcare delivery system, this standardized, evidence-based pathway uniquely prepares physicians to understand and recognize the subtle differences between many minor ailments (i.e. the common cold, indigestion) and serious ones (i.e. pneumonia, heart attack) that share similar symptoms, to engage in safe prescribing practices, and to perform other complex medical tasks.

Before becoming licensed to treat patients independently, physicians complete:

- **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 physicians develop advanced knowledge and clinical skills relating to a wide variety of patient conditions. Residencies are completed over the course of **three to seven years under supervision by physicians** who have completed residency training and a comprehensive licensing examination series.

- Physicians also complete a **comprehensive, three-part licensing examination** series designed to test their knowledge and ability to safely deliver care to patients before they are granted a license to independently provide care to patients.

In order to practice in Maine, CNPs complete:

- A **two-year master's degree** program comprised of didactic training (typically 50 hours) and clinical internship training (typically 600 hours).
- **No additional supervised postgraduate “residency” training is required.**
- **A certifying examination** created by an organization comprised primarily of other nurses.

Our organizations believe that all patients deserve access to high-quality medical care provided by a fully trained and licensed physician. CNPs, especially those with limited years of clinical experience, do not have the extensive medical education and training that physicians receive which prepares them to understand the medical treatment of disease, complex case management, and safe prescribing practices. Granting them the ability to practice similarly to a primary care physician, without evidence regarding patient safety outcomes, could jeopardize the health of Maine's patients; therefore, **we urge you to oppose LD 295.**

Sincerely,

American Osteopathic Association
Maine Osteopathic Association
Spectrum Healthcare Partners

ABOUT THE AOA

The AOA proudly represents its professional family of 151,000 osteopathic physicians (DOs) and medical students (OMS) nationwide. The AOA promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools, including the University of New England College of Osteopathic Medicine in Biddeford, ME. More information on DOs and osteopathic medicine can be found at www.osteopathic.org.

ABOUT THE MOA

The Maine Osteopathic Association is a professional medical organization that represents more than 1,000 DOs and OMS in Maine.

ABOUT SPECTRUM HEALTHCARE PARTNERS

Spectrum is Maine's largest statewide multispecialty, physician-owned and –directed professional organization, with more than 200 physicians practicing in the areas of anesthesiology, orthopaedics, pain management, pathology, radiation oncology, radiology, and vascular and interventional radiology. Spectrum contracts with healthcare facilities across Maine and in northern New England to provide these services.