



June 5, 2019
Ron Briel, Program Manager
Division of Public Health, Licensure Unit
Nebraska Department of Health and Human Services
P.O. Box 95026
Lincoln, NE 68509

Dear Mr. Briel:

On behalf of the American Academy of Family Physicians (AAFP), representing over 134,600 family physicians and medical students across the country, I write in opposition to the Nebraska Academy of Physician Assistants' (NAPA) application for a change in scope of practice.

This application is not a mere technical update and would significantly expand the scope of practice for physician assistants (PA). Specifically, the application loosens the definition of a supervising physician by changing it to a licensed physician who supervises a PA under a collaborative agreement. The collaborative agreement would allow PAs to independently prescribe medications, order and prescribe diagnostic support services, and order and prescribe non-pharmacological interventions. Finally, the proposal doubles the PA to physician ratio. These are significant changes as 45 states still require a supervisory relationship with PAs and not a collaborative one. Additionally, an 8:1 PA to physician ratio would be among the highest in the country. These proposals create significant patient safety issues and the application should be denied.

The AAFP opposes any proposal that would undermine the physician-led team-based care models that have proven to be most effective in improving quality and efficiency. The AAFP believes that health professionals should work collaboratively as clinically integrated teams in the best interest of patients. Physician-led, team-based care addresses patients' needs for high quality, accessible health care and reflects the skills, training, and abilities of each of the health care team members to the full extent of their state licenses. Furthermore, family physicians are uniquely qualified to lead the health care team because they possess distinctive skills, extensive training, experience and knowledge that allow them to provide comprehensive medical care, health maintenance, and preventative services for a range of medical and behavioral health issues.

All fully trained physicians are required to complete a four-year bachelor's degree, four years of allopathic or osteopathic medicine education, and then a minimum of three years of residency that includes 12,000 to 16,000 hours of clinical patient care. Family physicians are also required to take 150 hours of Continuing Medical Education (CME) training every three years. Board certified family physicians must also pass board certification exams every six to ten years along with completing annual requirement to maintain their certification. Physician education is

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standardized by state medical boards. Physicians are also required by law to carry their own medical liability insurance.

By contrast, PAs are required to complete a four-year bachelor's degree and three years of PA education. Students complete 2,000 hours of clinical practice during their PA education and do not complete an additional residency-like training. PAs must pass a national certifying examination and obtain state licensure prior to practice. They are required to take 100 hours of CME training every two years and sit for a recertification exam every ten years. Physician assistants are not required by law to carry individual medical liability insurance.

Physicians and PAs occupy interdependent roles in the delivery of quality, comprehensive health care. The AAFP recognizes the valuable contributions of the PA profession and are an integral part of a physician-led team. However, we believe that this proposal is not the answer and would further splinter the health care team. Physicians offer an unmatched service to patients and, without their skills, patients' safety would be at risk.

We strongly urge you to support physician-led health care teams by opposing the proposed application which would expand PAs' scope of practice. Thank you for your consideration. Please contact Shelby King, Manager, Center for State Policy, at 202.655.4902 or sking@aafp.org with any questions.

Sincerely,

A handwritten signature in black ink that reads "Michael Munger MD". The signature is written in a cursive style with a distinct "M" and "D" at the end.

Michael L. Munger, MD, FAAFP
Board Chair