



February 13, 2013

The Honorable Laurie Monnes Anderson  
Chair, Senate Health and Human Services Committee  
900 Court St. NE, S-413  
Salem, OR 97301

Dear Chairwoman Anderson,

**The American Osteopathic Association (AOA) and the Osteopathic Physicians and Surgeons of Oregon (OPSO) are writing to urge you to oppose SB 210 in committee.** This bill would allow certified registered nurse anesthetists (CRNA) to perform health evaluations, administer anesthesia plans, take any action to counter a problem arising from the administration of the anesthesia plan, and any necessary or routine post anesthesia care without medical collaboration with a physician. This increase in scope of practice comes without any accompanying increase in education, training or certification for CRNAs.

The AOA proudly represents its professional family of more than 100,000 osteopathic physicians (DOs) and osteopathic medical students; promotes public health; encourages scientific research; serves as the primary certifying body for DOs; is the accrediting agency for osteopathic medical schools; and has federal authority to accredit hospitals and other health care facilities. OPSO is a professional organization that represents the nearly 900 DOs providing patient care in Oregon.

The AOA and OPSO support the “team” approach to medical care and the physician-led medical model that has proven its ability to ensure that professionals with complete medical education and training are adequately involved in patient care. We recognize the role of CRNAs in the US health care system, and agree that they are valuable members of the patient-centered health care team. However, AOA policy requires that expansions in allied health professionals’ scope of practice must be accompanied by commensurate increases in education, clinical training and competency examination in order to protect public safety.

The education, postgraduate training and examination requirements for physicians are far more extensive than those of CRNAs. Prior to being admitted to medical school, a candidate must obtain a Bachelor’s degree. 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 three to seven years of postgraduate medical education, i.e., residencies, where DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.

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Physicians have extensive medical education and comprehensive training that have prepared them to understand medical treatment of disease, complex case management and safe prescribing practices. In addition, DOs have strenuous continuing education requirements and AOA Board Certified physicians participate in Osteopathic Continuous Certification (OCC). OCC ensures that board certified DOs can maintain currency and demonstrate competency in their specialty area. OCC includes lifelong learning and continuous education, cognitive assessment and practice performance and assessment. These requirements ensure that DOs engage in lifelong learning that keeps them up to date with the latest developments in medical education.

Oregon CRNAs only need to be registered nurses that have completed a nurse anesthesia educational program or complete 850 practice hours if they graduated more than two years prior. Physicians complete 12,000 to 16,000 hours of supervised postgraduate clinical training. In a recent national patient survey, 90% of respondents said that a physician's additional years of education and training (compared to a nurse practitioner) are vital to optimal patient care, especially in the event of a complication or medical emergency.

Allowing CRNAs to expand their scope of practice, without also increasing their level of education and postgraduate training, runs counter to the state's obligation of protecting the public. Additionally, eliminating the requirement that APRNs enter into a collaborative agreement with a physician will not improve access to care and may ultimately be detrimental to the health and safety of patients in the state of Oregon.

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, as well as adequate oversight by professionals with complete medical education and training. **We urge you to protect the safety of Oregon patients by opposing SB 210 in committee.** Should you need any additional information, please feel free to contact Nicholas Schilligo, MS, AOA Director of State Government Affairs, at [nschilligo@osteopathic.org](mailto:nschilligo@osteopathic.org) or (800) 621-1773, ext. 8185.

Sincerely,



Ray E. Stowers, DO, FACOFP dist.  
President, AOA



Robyn Dreibelbis, DO  
President, OPSO

CC: Norman E. Vinn, DO, AOA President-elect  
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