

**Testimony of Jill Mazza Olson**  
**Vermont Association of Hospitals and Health Systems**  
**Mental Health Oversight Committee**  
**October 3, 2014**

**Role of Licensed Independent Practitioners**

VAHHS supports allowing APRN's and PAs to practice to the full scope of their licenses in Vermont, as allowed under federal CMS standards. That would include ordering emergency involuntary procedures. The rule proposed by the Department was consistent with that position. Under Vermont Statute, APRNs and PAs are "independent" practitioners.

- 26 VSA 1572 (4) specifically provides APRN's with the same signature authority as physicians, even when only a physician is specified by law (see AHS response to LCAR decision).
- 26 VSA 1616 and 1732 (5) provide similar authority to PAs (see AHS response to LCAR decision).

**Phone Orders for Emergency Involuntary Medication**

VAHHS supports aligning Vermont standards with federal CMS standards. Federal CMS standards allow for orders for emergency involuntary procedures to be made over the phone, with in-person follow up by a specially trained clinician. The rule proposed by the Department was consistent with that position.

**Application of the Rule to Other Units (Beyond Adult Inpatient Psychiatric Units)**

Emergency departments: Federal CMS standards for emergency involuntary procedures should be the standard for emergency departments.

Children: CMS standards are different for children than they are for adults. The rule proposed by the Department would need to be re-considered in light of current federal and state standards for children.