



Thank you for inviting me to testify on the issue of physician assistant licensure and S.128. As you know, VAHHS represents all of Vermont's hospitals, and we value the opportunity to provide the perspective of hospitals and their providers.

When this bill was first introduced, it eliminated the requirement that physicians supervise physician assistants and replaced the requirement with privileges at a hospital. We consulted with many providers at our hospitals who were uncomfortable with this arrangement and advocated for a practice agreement as a middle ground between full supervision and privileges. The latest draft reflects this compromise, and we support that change.

One area that is still outstanding is whether the practice agreements must be submitted to the Board of Medical Practice. Currently, the rules around the delegation agreements for PAs state:

27.6 Filing of a Delegation Agreement with the Board to establish a work site for a PA does not constitute Board approval of the substance of the Delegation Agreement, nor is it evidence that the Board finds the plan for supervision adequate. **Acceptance of the filing is only acknowledgement that the Board has received the completed documentation.**

This means that the file should be considered complete instantaneously. Our providers, however, report that the process can take days and that the Board of Medical Practice can be very proscriptive when they require changes to proposed practice agreements regarding the method and frequency of supervision process. Other providers mentioned that the process can be inconsistent and that efforts to standardize the delegation agreements in the past have failed.

The Board of Medical Practice acknowledges that, instead of being instantaneous, the staff reviews the delegation agreements, remarks on the delegation agreement and then files them, as opposed to merely accepting the agreement upon receiving it.

While our hospitals support using a practice agreement, they do not support a review process at the Board of Medical Practice. As seen with the current delegation agreements, this process can cause unnecessary delay and confusion. We support an option where once an agreement is created, there is no delay in licensure.

Devon Green
Vice President Government Relations
Vermont Association of Hospitals and Health Systems