



May 17, 2021

The Honorable Andrea Stewart-Cousins
New York State Senate President Pro Tempore and Majority Leader
188 State Street
Legislative Office Building, Room 907
Albany, New York 12247

Dear Senator Stewart-Cousins:

The American Osteopathic Association (AOA), the New York State Osteopathic Medical Society (NYSOMS) and the American College of Osteopathic Internists (ACOI) are writing to express strong concerns with SB 3056-A. This bill eliminates the requirement that nurse practitioners (NPs) must complete 3,600 hours of collaborative practice with a physician before they become eligible to independently treat patients, and instead allows the collaborative practice requirement to be fulfilled by another NP. The AOA and the ACOI share the concerns of the NYSOMS that such a large increase in scope of practice for NPs, without any mandatory increases in education, training or certification competency requirements, may put the health and safety of New York patients at risk.

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. More information on DOs and osteopathic medicine can be found at www.osteopathic.org. The NYSOMS is a professional organization that represents more than 7,000 actively licensed DOs and OMS providing patient care in New York. The ACOI is a national medical specialty society representing more than 8,700 osteopathic internists across the United States.

Our organizations support 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. While we value the contributions of all health care providers to the health care delivery system, we believe that NPs’ education and training lacks the comprehensive and robust requirements needed to safely provide patients with the broad range of unsupervised primary care services authorized by this bill.

Osteopathic medical education includes:

- **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.

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- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where DOs 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**.

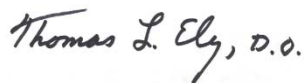
NP education includes:

- A **two-year master's degree**, which may be done largely online.¹
- The bill requires **no additional coursework or supervised postgraduate (“residency”) training**.

This bill expands the scope of practice for NPs by:

- Deleting the requirement that NPs practice subject a collaborative practice agreement with a physician for the first 3,600 hours, and replacing it with language that allows the collaborative requirement to be fulfilled by another NP with independent practice.

The AOA, the NYSOMS and the ACOI urge you to protect patient safety by opposing SB 3056-A. Should you need any additional information, please feel free to contact Raine Richards, JD, Director, State Government Affairs at rrichards@osteopathic.org or (312) 202-8199.



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¹ See <https://www.onlinefnpprograms.com/school-profiles/utica-college-online-fnp-program/>