

**Representative Chippendale**

House Committee on Health & Human Services  
RI General Assembly  
Rhode Island State House  
82 Smith Street  
Providence, RI 02903

**Date February 23, 2025**

**RE: Testimony OPPOSING House Bill H 5428, AN ACT RELATING TO BUSINESSES AND PROFESSIONS -- NURSES**

Dear Representative Chippendale,

I am writing to you with great respect and understanding for your motivations in seeking certainty regarding the use of propofol in the private healthcare sector. I understand what it is like to feel vulnerable when we must trust professionals with our care during important medical procedures. It can be a scary experience, but having confidence in those professionals, who are acting with care and within professional guidelines, is what makes all the difference.

However, your reintroduction of legislation that limits all sedation practices exclusively to Certified Registered Nurse Anesthetists (CRNAs) raises significant concerns. While the intention behind such legislation may stem from concerns about the potential overuse of general anesthetic medications, it overlooks the broader and essential use of these medications for moderate and light sedation. This oversight would significantly limit access to care. By singularly focusing on one aspect and area of their use, the broader implications of this legislation on the healthcare system are not adequately addressed. The result will likely be unintended negative consequences for patients and professionals alike.

The healthcare system in Rhode Island, like in many other regions, is designed to provide access to the safest and highest quality care for all residents. Health care legislation should aim to enhance care and ensure that all Rhode Islanders have access to the best services. Restricting sedation practices in the way this bill proposes could have a far-reaching impact on patient care and access to treatment.

Moreover, it is crucial to recognize that healthcare professionals' roles and responsibilities have always overlapped, often in collaborative ways. Unfortunately, this bill discriminates against a specific group of advanced practice professionals (APPs)—nurse practitioners—while ignoring the fact that other APPs, such as physician assistants, also administer these medications. Restricting the evidence-based, appropriate use of these medications will only exacerbate workforce shortages, which is particularly concerning given that Rhode Island is already facing a healthcare crisis. Full practice authority for a profession is not an expansion of scope for the sake of access; it is, instead, a means to increase access to care. There are already checks and balances in place to regulate professional practice, including licensing, statutes, regulations, board

certifications, and professional guidelines. We should not limit professional practice in any narrow way based on one specific aspect of care.

Additionally, regulating medications through blanket legislation of this nature is short-sighted and fails to consider the dynamic, evolving landscape of healthcare. The legislation disregards the safe, effective use of these medications by appropriately trained APPs, and it fails to take into account the evidence supporting their competency in using these medications under appropriate training and oversight.

The inclusion of Registered Nurses (RNs) in this bill creates confusion. Nurse Practitioners (NPs) and Certified Registered Nurse Anesthetists (CRNAs) possess education and training that far exceed that of RNs. While there is growing momentum in several states to include RNs in certain areas such as gastrointestinal sedation, this remains a highly controversial topic. Boards of nursing across the nation are grappling with this issue. While the increasing demand for procedures has led to creative solutions for providing conscious sedation, the appropriate approach to this issue lies within regulatory measures, not in legislative overreach.

Effective healthcare legislation requires a balanced approach, one that considers the perspectives of all stakeholders. It is critical to engage in open dialogue with healthcare professionals to understand the full scope of this issue. Legislation should be informed by evidence-based practices and the collective wisdom of the healthcare community, ensuring that we craft policies that work in practice, not just in theory.

We believe this bill is overreaching, unnecessary, confusing, discriminatory, and ultimately a threat to access to safe, quality care for Rhode Islanders. Patients and their families will suffer undue harm and hardship as a result of this legislation. Nurse practitioners' practice will be unfairly restricted, particularly when compared to other similarly trained advanced practice professionals like physician assistants.

This is a complex issue that requires a thoughtful, nuanced solution. We cannot address your concerns adequately with one-sided legislation. We hope to be given the opportunity to educate you and other lawmakers on the safe and effective use of these medications, and the many ways in which they are applied under proper oversight and training. By working collaboratively and utilizing the existing regulatory framework, we can ensure that Rhode Islanders have access to the safest and highest quality healthcare, while appropriately utilizing the skills of our healthcare workforce.

Thank you for your attention to this matter. I look forward to the opportunity for further dialogue.

Sincerely,  
Dr Anne E. Neuville, DNP, APRN-CNP, FNP-BC  
District 19