

February 24, 2025

House Committee Health and Human Services
RI State House
82 Smith Street
Providence RI 02903

RE: Testimony in Opposition to House Bill 5428 entitled An act relating to the business and professions- nurses

Dear Chairperson Donovan and members of the HHS Committee:

I oppose House Bill 5428 entitled An act relating to the business and professions- nurse anesthetists

I am Jessica Gotjen Seth from Cranston, District 26 and current Director of Medical Staff Services at Brown University Health. As an industry professional on credentialing and privileging for over 20 years, I urge you to vote against bill 5428 which will significantly impact the patient care provided at not only Brown University Health but all hospitals in Rhode Island. This bill does not account for the rigorous credentialing and privileging process that Nurse Practitioners as well as other licensed practitioners undergo at hospitals prior to being able to perform any clinical activity.

The credentialing and privileging processes for hospitals are governed by Centers for Medicare and Medicaid Services, The Joint Commission and Rhode Island state law. Regarding the practice of sedation these regulators ensure that hospitals develop and maintain policies and procedures for practitioners permitted to provide analgesia and moderation sedation outside of the operating suites. Privileges to administer moderate and deep sedation is tightly governed based on these standards and support pathways for Nurse Practitioners to be able to receive post graduate education and be appropriately privileged to perform sedation.

At Brown University Health hospitals the performance of sedation, utilizing propofol or other general anesthetics, is tightly monitored. To be granted the privilege of sedation, one must successfully complete required training and attain a satisfactory test score greater than 90% on the Sedation and Analgesia Guidelines for Procedures Outside of the Operating Room, guidelines developed by the Chief of Anesthesia. After undergoing the training one should be able to apply a standardized approach to use sedation at Brown University Health Hospitals, describe the anesthetics continuum and distinguish drug choices for providing and reversing the various levels of sedation, assess, monitor and document the patient status prior to, during and after a sedated procedure, recognize risk factors and predict difficulties and choose rescue airway techniques to use in the event of respiratory compromise. The Chief of Anesthesia also independently reviews and approves all requests for sedation privileges including our Nurse Practitioners.

In order to ensure compliance with our regulatory bodies in regard to advanced practice providers at Brown University Health, we developed a comprehensive privileging inventory with

proposed minimum standard requirements and teaching methods for achieving competency/skill maintenance based on supporting literature outlining best teaching and training practices. Departments across Brown University Health have developed post graduate education plans to establish universal criteria to transition advanced practice providers from dependent to independent practice to ensure patients are provided with the best care possible from rigorously vetted and trained advanced practice providers, including our Nurse Practitioners.

In addition, the Joint Commission requires us to continuously monitor all providers in which we grant clinical privileges by undergoing focused professional practice evaluation during the first year of being granted privileges. This evaluation includes but is not limited to, elements of concurrent proctoring, chart review and education. After initial successful completion of the focused professional practice process, we are also required to monitor ongoing professional practice evaluation every 12 months in addition to the re-credentialing and privileging requirement every 36 months. These regulations and requirements help ensure continuous review of privileges, clinical indicators and most importantly help safeguard patient care and ensure the practice of our advanced practice professionals is continuously monitored.

Thank you for your time and the opportunity to provide rationale against bill 5428.

Sincerely,

Jessica B Gotjen Seth
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House District 42