



RI Department of Health
Three Capitol Hill
Providence, RI 02908-5097

TTY: 771
www.health.ri.gov

March 31, 2026

The Honorable Melissa A. Murray, Chair
Senate Committee on Health and Human Services
State House
82 Smith St.
Providence, RI 02903

RE: S 2859 – An Act Relating to Businesses and Professions -- Physician Assistants

Dear Chair Murray:

Please accept this letter regarding S 2859, legislation that would create a Rhode Island specialty license for physician assistants (PAs) who earn the National Commission on Certification of Physician Assistants (NCCPA) psychiatry Certificate of Added Qualifications (CAQ), formally recognizing advanced behavioral health qualifications and supporting appropriate insurance reimbursement.

Initial licensure would require holding an active Rhode Island license, a current CAQ in psychiatry, completion of required continuing medical education (CME) in psychiatry, completion of required clinical experience hours in psychiatry practice, and attestation of competency by a collaborating physician. For the license to be renewed, the PA must demonstrate continued maintenance of the psychiatry CAQ.

In Rhode Island, PAs are not required to do residencies as physicians entering psychiatry are required to do. There are optional 12-month residency programs for PAs in mental healthcare, including programs at University of Massachusetts and Dartmouth-Hitchcock; however, none are available in Rhode Island. NCCPA offers CAQs in 12 specialties, with more likely to come. To sit for the psychiatry CAQ exam, PAs must have completed 75 hours of CME credits in psychiatry in the previous 6 years and 2,000 hours of experience (one year of full-time practice) in psychiatry within 6 years of the date they attest to the NCCPA that the experience requirement has been satisfied. The clinical experience is not confirmed by the NCCPA, although PAs are subject to audits for documentation of work experience.

The only state that issues a separate license for this distinction is Utah, which requires a doctorate degree and completion of 10,000 hours of clinical care in psychiatry (the first 4,000 of which have to be under the direct supervision of a psychiatrist and the remainder done in collaboration with a psychiatrist) with very specific requirements in training/experience ([C58-70a-S501.1_2021050520210505.pdf](#)). (This bill would allow a masters-level PA degree.)

The Rhode Island Department of Health's (RIDOH's) current PA license application does not capture CAQs. RIDOH would need to create an additional license type. It is unclear why a separate license would be issued for a PA in psychiatry and not for the other 11 specialties for which CAQs are available, including primary care specialties (pediatrics, geriatric medicine (OB/GYN), surgical specialties, and hospital medicine. There is value in capturing the CAQs of PA licensee applicants without the need to create a new license type.

RIDOH suggests adding a question on every PA application (initial and renewal) asking whether they have a CAQ in any specialty, requiring them to provide the CAQ certificate and work history in the specialty, and obtaining contact information for their supervising or collaborating physician(s) in order to verify that they have the training and experience necessary to provide safe care in that specialty. Information on specialty CAQs would be added to the provider profile on the RIDOH website and forwarded to the EOHHS Ecosystem that populates our State's healthcare workforce dashboards, ensuring that patients are aware of PAs practicing psychiatry and other specialties with the additional knowledge and training required for a CAQ.

RIDOH welcomes the opportunity to work with the sponsors of S 2859 on amendments to implement RIDOH's suggestions. Thank you for the opportunity to comment on this legislation.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin" with a long horizontal flourish extending to the right.

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the Senate Committee on Health and Human Services
The Honorable Alana M. DiMario
Kristen Silvia, Director of Legislation and Deputy Chief of Staff
Patricia Resende, Director of Senate Policy