



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 2868 – An Act Relating to Businesses and Professions -- Physician Assistants**

Dear Chair Murray:

Please accept this letter regarding S 2868, legislation that would increase continuing medical education requirements for physician assistants (PA), remove restrictions on physician assistants to render charitable care provided they have liability coverage, permit physician assistants to render aid under *The School and Youth Programs Concussion Act* and *The Sudden Cardiac Arrest Prevention Act*, and prohibit restrictive covenants and non-compete agreements for PAs. The Rhode Island Department of Health (RIDOH) would like to clarify that the bill would align continuing medical education requirements for PAs to their license cycle by changing the requirements from 25 hours annually to 50 hours biannually.

RIDOH recommends the following amendments:

- On page 5, line 4 – re: criminal background checks – In order to comply with the requirements of the PA Compact, clarify that the criminal history records check must be a federal fingerprint or biometric criminal background check. In addition, as RIDOH is introducing statutory language to effectuate the criminal background check requirement for the PA Compact (and other interstate healthcare professional license compacts), there may not be a need for additional regulations, so we request that the word *shall* be changed to the word *may* for the promulgation of rules and regulations to fulfill the criminal background check requirements.
- In Section 5-54-22 regarding CME requirements, the PA license cycle begins on July 1 and ends on June 30. Please change the language on page 5, lines 9-12 to the following:
  - “The biannual period for accumulation of continuing education hours commences on the **first day of July** and runs through the **last day of June** beginning in 2025. Beginning with the biannual renewal period commencing the first day of July 2027...”

RIDOH welcomes the opportunity to work with the sponsors of this legislation to refine

RIDOH's proposed amendments. 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 Bridget Valverde  
Kristen Silvia, Director of Legislation and Deputy Chief of Staff  
Patricia Resende, Director of Senate Policy