

**From:** [Pierce, Katherine, NP](#)  
**To:** [Sen. Murray, Melissa A.](#); [Sen. Lauria, Pamela J.](#); [Sen. Urso, Lori](#); [Sen. Appollonio, Peter A. Jr.](#); [Sen. Rogers, Gordon E.](#); [Sen. Thompson, Brian J.](#); [Sen. Ujifusa, Linda L.](#); [Sen. Valverde, Bridget G.](#); [SLegislation](#)  
**Subject:** Oppose Bill S3184  
**Date:** Tuesday, April 7, 2026 7:59:38 AM

---

Some people who received this message don't often get email from [kpierce1@brownhealth.org](mailto:kpierce1@brownhealth.org). [Learn why this is important](#)

Dear Members of the Legislature,

I am writing once again regarding Bill S3184, which has now been introduced for the third year in a row. In previous discussions, healthcare professionals throughout the state have outlined the significant concerns this legislation raises and the potential harm it poses to healthcare access in Rhode Island.

Bill S3184 reflects a continued effort to place new limitations on how and when registered nurses and nurse practitioners can administer procedural moderate sedation. If passed, these changes could disrupt well-established clinical workflows and reduce timely access to care for patients across a variety of healthcare settings.

From a clinical standpoint, we have already shared data and real-world experience demonstrating that current moderate sedation practices in Rhode Island are safe and effective. There is no evidence suggesting a need for change, and notably, there have been no documented safety issues involving nurse practitioners performing these responsibilities. It is also important to emphasize that deep sedation and general anesthesia would remain exclusively within the scope of anesthesia specialists.

From an operational perspective, restricting these practices could lead to delays in care, increased procedural backlogs, and added strain on a healthcare system that is already facing workforce and capacity challenges. For patients, this may translate into longer wait times, rescheduled procedures, or reduced access to necessary interventions, particularly in community and hospital-based settings.

A number of professional organizations have expressed opposition to this bill, emphasizing that it is not the most appropriate or effective way to address patient safety concerns. If this legislation were clearly grounded in improving safety outcomes, it would likely have broader support among nurse practitioners and frontline providers. Instead, many clinicians remain concerned that the driving forces behind the bill may not fully reflect the realities of patient care delivery.

It is also worth noting that many of the strongest proponents of these restrictions are not practicing in the clinical environments that would experience the greatest impact, which

creates a disconnect between policy and practice.

In contrast, healthcare professionals across Rhode Island have encouraged the Rhode Island Department of Health (DOH) and the Board of Nursing (BON) to take the lead in developing thoughtful, evidence-based regulatory guidance. The DOH has recently released a draft of proposed guidelines, which are currently under review by a wide range of stakeholders, including hospitals, anesthesia groups, executive leadership teams, and organizations such as the Hospital Association of Rhode Island.

These guidelines will soon enter a public comment period, allowing for meaningful input from those directly involved in patient care. While the regulatory process has taken time, it reflects a careful and deliberate effort to address this issue in a way that balances safety, access, and practicality.

Given this progress, I respectfully urge the legislature to allow the regulatory process to move forward and to defer to the expertise of the agencies and professionals who are most familiar with the complexities of healthcare delivery.

Please feel free to contact me with any questions. I would welcome the opportunity to discuss this matter further.

Respectfully,

**Katherine Pierce, FNP-C**

Family Nurse Practitioner  
Brown Health Pre-admission Testing  
401-575-7324

This transmission is intended only for the addressee(s) listed above and may contain information that is confidential. If you are not the addressee, any use, disclosure, copying or communication of the contents of this message is prohibited. Please contact me if this message was transmitted in error.