



RI Department of Health  
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[www.health.ri.gov](http://www.health.ri.gov)

March 12, 2024

The Honorable Susan R. Donovan  
Chairwoman  
House Committee on Health and Human Services  
State House  
82 Smith Street  
Providence, RI 02903

**RE: H 7825 – An Act Relating to Businesses and Professions – Certified Surgical First Assistants**

Dear Chairwoman Donovan:

I am writing with concerns about H 7825, legislation that would require the licensing of certified surgical first assistants through the Rhode Island Department of Health (RIDOH). H 7825 would also create a new seven-member licensure board.

RIDOH traditionally supports requiring new licensure categories when clear evidence exists that additional regulatory oversight is needed to protect public health and safety. RIDOH is not aware of any reasons for additional oversight of these professionals. Finally, RIDOH does not have authority over Rhode Island hospitals that may require additional certification from an entity specifically approved by each Rhode Island hospital. RIDOH has not been able to identify any exclusions in current State law or regulation preventing any personnel deemed qualified by a licensed physician and healthcare facility from being a surgical assistant.

RIDOH is not able to support H 7825 unless evidence is presented that it protects public health and safety and that the funding required for implementation is included in the State budget. RIDOH staff would be required to license this new class of health professionals and provide staff support to the proposed newly created board. RIDOH currently licenses 74 categories of healthcare professionals and manages 25 boards. At least one additional FTE would be required to implement this licensure initiative, at a total cost of \$111,707 (salary and benefits) that would be subject to annual increases.

Thank you for the opportunity to comment on this legislation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Utpala Bandy", with a small "for" written below it.

Utpala Bandy, MD, MPH  
Interim Director

CC: The Honorable Members of the House Committee on Health and Human Services  
The Honorable David A. Bennett  
Nicole McCarty, Chief Legal Counsel to the Speaker of the House  
Lynne Urbani, Director of House Policy