

## Steven Sepe

---

**From:** Joslin Leasca <joslinleasca1@gmail.com>  
**Sent:** Wednesday, May 29, 2024 4:08 PM  
**To:** House Health and Human Services Committee; Rep. Fogarty, Kathleen A.; Rep. McEntee, Carol Hagan; Rep. Tanzi, Teresa A.; Rep. Donovan, Susan R; Rep. Shekarchi, K Joseph  
**Subject:** Opposition to H8296

From: Dr. Joslin B. Leasca, DNP; CNL, CNE, NE-A, FNP -BC  
258 Kettle Pond Drive  
Wakefield, RI 02879  
(401) 742-6967

To: Rhode Island House of Representatives  
82 Smith Street  
Providence, RI 02903

Dear Representatives,

I am writing to express my strong opposition to House Bill H8296 for 2024, which seeks to exclude nurse practitioners from serving as medical directors of their own businesses providing cosmetic medical services within their scope of practice.

Nurse practitioners (NPs) in Rhode Island have enjoyed full autonomy since 2008, a recognition of their extensive training, expertise, and dedication to patient care. Restricting NPs from roles that fully utilize their skills not only undermines their professional autonomy but also limits the quality and accessibility of healthcare services available to Rhode Islanders.

Of particular concern is the role of the medical director. This bill would remove the entrepreneurial opportunity for nurse practitioners to serve as medical directors of their own businesses, a role that many other types of advanced practice nurses already fulfill. Psychiatric nurse practitioners, primary care nurse practitioners, and nurse midwives often serve as their own medical directors, managing practices that involve far more complex and risky care than aesthetic services.

Forcing autonomous nurse practitioners to hire a physician simply as a medical director forces nurse practitioners into a dependent role, which is antithetical to the Rhode Island Nurse Practice Act.

The restriction proposed by Bill H8296 stands in stark contrast to the evidence-based practice and the movement towards greater NP autonomy seen across the United States. Research consistently supports the safety and efficacy of NP-led care. For example:

1. A 2018 systematic review in the Journal of the American Association of Nurse Practitioners found no significant difference in the quality of care provided by NPs compared to physicians\*\* (1).
2. The Institute of Medicine's report "The Future of Nursing: Leading Change, Advancing Health" emphasizes the importance of allowing NPs to practice to the full extent of their education and training\*\* (2).

Historically, nurse practitioners in Rhode Island have demonstrated exceptional competence in delivering aesthetic services. To date, there has not been a single complaint or malpractice suit related to the care provided by NPs in this field according to the Rhode Island Department of Health's public disciplinary records (3).

Moreover, the motivations behind Bill H8296 appear to be driven not by a genuine desire to improve patient care and safety, nor to increase access to quality care, but rather by competitive interests. Specifically, this bill seems to be pushed by competitors such as dermatologists who stand to benefit from limiting the practice of NPs.

Limiting NPs' roles in aesthetic practices could have unintended economic consequences. Many NPs are small business owners who contribute to the local economy by providing jobs and services. By preventing them from leading aesthetic centers, we risk not only reducing the availability of these services but also stifling economic growth and innovation in the healthcare sector. One area in particular, South County, would be affected.

I would like to share a personal note. At one time in my life I was a patient at Dana Farber for the treatment of breast cancer. During this time I underwent surgery and treatment that had a devastating impact on my self-image as a woman. With the expert care of the Family Nurse Practitioner who worked closely with me to heal surgical wounds and emotional post traumatic stress after lengthy medical intervention, I regained my sense of self and femininity.

In conclusion, I urge you to consider the overwhelming evidence of the high-quality care provided by nurse practitioners, their unblemished record in aesthetic services, and the broader implications of restricting their practice. Maintaining NPs' autonomy and allowing them to serve as medical directors in aesthetic centers aligns with Rhode Island's commitment to accessible, high-quality healthcare and entrepreneurial opportunity.

Thank you for your attention to this important matter. I hope you will vote against Bill H8296 and continue to support the autonomy and entrepreneurial spirit of nurse practitioners in Rhode Island.

Sincerely,  
**Dr. Joslin B. Leasca**  
Dr. Joslin B. Leasca

References:

1. Swan, M., Ferguson, S., Chang, A., Larson, E., & Smaldone, A. (2018). Quality of primary care by advanced practice nurses: A systematic review. *Journal of the American Association of Nurse Practitioners*, 30(11), 634-645.
2. Institute of Medicine. (2011). *The Future of Nursing: Leading Change, Advancing Health*. Washington, DC: The National Academies Press.
3. Rhode Island Department of Health. (2024). *Disciplinary Actions*. Retrieved from [Rhode Island Department of Health](<https://health.ri.gov>).