



May 29, 2024

Representative Susan Donovan, Chair  
House Committee on Health & Human Services  
82 Smith St.  
Providence, RI 02903

**Re: Testimony in opposition of H8296**

Dear Chair Donovan and Members of the House HHS Committee,

I, Denise Coppa, from House District 31 and Legislative Liaison, representing the Nurse Practitioner Alliance of Rhode Island, am writing in opposition to H 8296, THE MEDICAL SPAS SAFETY ACT. To clarify, Certified Nurse Practitioners (CNP) are Advanced Practice Registered Nurses (APRN) who have successfully completed advanced education at the masters and/ or doctoral level and have taken professional certification or "board" exams that allow them to be licensed by the state of RI, with full practice authority. This includes the ability to diagnose, treat, and prescribe medications and to be the primary care provider of record for citizens in Rhode Island, across the life span. I feel that this bill was written in haste and, if passed, would have a negative impact on client access to chosen health care services, while infringing on the rights of nurse practitioners with full practice authority to own and operate private businesses delivering these services.

The bill unnecessarily limits the role of medical director to a "physician, who assumes the role of, of holds oneself out as medical director at a medical spa." Since licensed, certified nurse practitioners, hold full practice authority by statute and regulation in Rhode Island, this type of supervision is unwarranted. The bill requires training ... "in the indications for, and performance of, cosmetic medical procedures," but this training or training options are not outlined specifically in this proposal. On line 16-17 of p. 2/14, it clearly states that [the medical director]... "is responsible for the oversight of all cosmetic medical procedures performed by physicians, PA's and APRN's, and non-physicians." This language is unclear and redundant. In addition, the bill is aimed at limiting the practice of APRN's. In statute, nurse practitioners are one group of APRN'S. This is confusing. "Supervision" on the last line of p. 2/14 seems to contradict earlier language in the bill, due to the fact that it allows any APRN to supervise this practice and be on site to directly observe the practice. Let me go on with further confusion on line 18 on p. 3/14 where it once again states that [the medical director] is "...responsible for the oversight of all cosmetic procedures performed by physicians, PA's, APRN'S and non-physicians."

Lastly, on p. 3/14, line 29-30, it states that the APRN who performs cosmetic medical procedures or supervises cosmetic medical procedures ... shall be accredited by the state board of nursing. The state board of nursing is a regulatory board and does not "accredit" individual providers.

I urge this committee to take a step back from this confusing legislative proposal and differentiate about which groups would most benefit if this passes out of committee. Certainly, it does not seem to protect the patient, but rather, to limit the practice authority that governs nurse practitioner licenses in Rhode Island.

Sincerely,

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