

Written Testimony of the  
Connecticut State Medical Society  
Connecticut ENT Society  
Connecticut Urology Society  
Connecticut Society of Eye Physicians  
Connecticut Dermatology and Dermatologic Surgery Society  
Connecticut Chapter of the American College of Surgeons

**On S. B. No. 428 AN ACT CONCERNING REVISIONS TO THE PUBLIC HEALTH  
RELATED STATUTES.**

Before the Public Health Committee  
On  
March 12, 2010

We (the above-listed organizations) thank the department, and Ms Buckley-Bates, for their help on this bill, and their responsiveness and openness. We have concerns about two passages in the proposed bill: lines 643-653, and lines 2878-2894. Our first concern is that the original language in line 652 would create a major expansion of scope for the listed professions, one which merits careful consideration, and has not been publicly debated. Fortunately, the department has been very helpful in working out more appropriate language to achieve the laudable goal of making sure patients in many settings can receive their duly prescribed medications without interruption. The language proposed, as we have it, would change lines 652-653 by deleting "...podiatrist, optometrist..." from 652 and adding enabling language after 653, as follows:

651 medical regimen under the direction of a licensed physician, dentist,

652 **physician assistant[, podiatrist, optometrist]** or advanced practice

653 registered nurse. A registered nurse may also execute orders issued by licensed podiatrists and optometrists provided such orders do not exceed the nurse's or the ordering practitioner's scope of practice.

We support this rewording of this section, as it achieves the goal of proper patient care, without impacting scope of practice.

The second concern we have is in the section (55) dealing with Medical Foundations (lines 2878-2894). These are special corporations set up to allow hospitals and large health systems to integrate their care with each other and with other providers in integrated inpatient-outpatient systems. Given that optometrists do not have hospital privileges at any major institution in this state, including the words "..., an optometrist licensed under chapter 380..." in lines 2893-4 is inappropriate and could represent an unintended expansion of scope. This wording did not appear in any version of the original bill that was debated and passed through a variety of

committees, and both chambers, last year. The supporting documentation in statute and in the bill summary indicates that optometrists already have the ability to form corporate entities, even those including other providers (ophthalmologists) for the purposes of practicing, so there is no significant restriction on them currently and no relief given by adding them here. We strongly oppose incorporation of this language into statute.

We appreciate the department's receptiveness to our concerns and willingness to work these issues through. We would be happy to continue working with you on this bill, and in the future. Thank you.