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**Testimony on Raised Bill 5258: An Act Implementing the Recommendations of the
Program Review and Investigations Committee Concerning Scope of Practice
Determinations for Health Care Professions**

Presented By: Stephen A. Karp, MSW, Executive Director

The National Association of Social Workers, CT Chapter is in general support of Raised Bill 5258. We appreciate the difficulty legislator's face in evaluating bills regarding professional scope of practice, especially as most legislators will not be members of the profession that the bill addresses. We feel that having a process in the front end before legislation is offered that requires professions to address issues of need and impact is a reasonable requirement that will hopefully lead to better legislation.

While we are in general support of the bill there are several sections where we strongly recommend the language be modified, as follows:

- **Section 1. (5):** We urge that the following language in italics be deleted: "*and the impact that the request will have on current regulatory oversight*". We do not believe that a profession can speak for the regulatory agency responsible for oversight as to the impact on that agency. We support such an impact analysis but it needs to come from the oversight agency, not the profession submitting the scope of practice.
- **Section 1. (8):** We urge that this point be redrafted to read as follows: *The number and types of professional disciplinary actions against the members of the profession in the past five years.* It is not reasonable for a profession to be expected to know of the number and types of malpractice suits brought against members of the profession. Nor do we believe that it is readily identifiable as to the number and nature of complaints filed that do not result in findings against the practitioner. DPH does post online disciplinary actions that go back to 2005, thus that information is available.
- **Section 1. (11) (d):** We recommend that the time for a profession to respond to a posting of a proposed scope of practice be longer than the current deadline of October 1, 2010. This only gives professions from September 15 to October 1 to respond to another profession's filing of a scope of practice. Most health care professions are represented by volunteer leadership and associations that have internal decision making processes for which a two-week turn around period is inadequate to fully digest another profession's proposal and to offer a substantial response. *We recommend a 30 day response period with an October 15th deadline.*

- **Section 1. (11) (d):** Just as we seek pushing back the date as noted in the above point we feel that the requester needs greater time to submit a written response to any opposing comments. *We recommend that the October 15th deadline for written responses to opposition be moved to November 15th to allow for a 30 day response time.* An alternative approach that can still allow for 30 day response times is to start the entire process earlier than September 15th.

Thank you for consideration of our comments and recommendations presented in this testimony.