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PRESIDENT

LIBBY MCDANNELL, CAE
CHIEF EXECUTIVE OFFICER

November 1, 2023

The Honorable Warren Petersen
1700 West Washington
Phoenix, Arizona 85007

The Honorable Ben Toma
1700 West Washington
Phoenix, Arizona 85007

Dear Senate President Petersen and Speaker Toma:

On behalf of the Arizona Medical Association and our nearly 4,000 member physicians, we respectfully request your consideration of the Sunrise Application to allow Medical Assistants (MAs) to perform specified administrative duties without supervision.

It is our belief that this change in statute will reflect the movement towards a physician-led, team-based model of health care delivery that increases efficiency and results in better outcomes for patients. Administrative duties have become overwhelmingly burdensome for our healthcare system and have strongly correlated with increasing rates of burnout. When a physician experiences burnout, it can have a serious impact on their productivity and morale due to the frustrations of having their attention diverted from patient care. US Surgeon General Vivek Murthy, MD succinctly captured the problem: "To be denied the care, often time-sensitive care, that a patient needs because of a bureaucratic process that often feels like it's set up to inhibit care and prevent expenditures rather than improve quality of care—that hurts patients and doctors. Blow after blow, when you're struck by that day after day, it's tough. It's incredibly difficult not to lose faith in the system. "

The long-term impacts are even more concerning as burnout is an often-reported reason for physicians leaving the profession amid a dire physician shortage. Arizona cannot afford to lose a single physician and it is our belief that this legislation will help ease burdens and increase efficiency in our healthcare system. This scope expansion is not a panacea but is a step forward that will have meaningful improvements for our physicians and healthcare systems.

Attached is further information regarding this proposal, language, and letters of support from our community. We appreciate your time and consideration and look forward to working with you in the 2024 session.

William Thompson IV, MD
President

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Pursuant to the requirements of A.R.S. §32-3104 and A.R.S. §32-3106, the Arizona Medical Association submits this notification of application to the Joint Legislative Audit Committee (JLAC) of the Arizona Legislature to reclassify specified administrative duties of Medical Assistants as unsupervised. The following information is provided:

1. Why an increased scope of practice is beneficial, including the extent to which health care consumers need and will benefit from safe, quality care from practitioners with this scope of practice.

This increased scope of practice will be very beneficial for both health providers and patients as it will remove impractical and unnecessary administrative barriers to care and access to information for patients. Under the current statute, an MA may perform specified tasks without direct supervision such as: scheduling appointments for patients, recording a physician's findings in patient charts and transcribing, perform billing and coding, verify insurance, take and record patient vitals and medical history, and perform visual acuity screening as part of a routine physical. This proposal would simply add to that list that an MA may also communicate documented medical advice, documented interpretations of tests, and documented orders from a licensed medical provider as well as obtain, process, and communicate prior authorizations as documented and ordered by a licensed medical provider.

This expansion will ease burdens on physicians and other providers by allowing them to delegate these administrative tasks to MAs thus allowing them to spend additional quality time with their patients. Like physicians, many patients report frustration at how little time they are able to spend with their physician. This proposal will begin to address that issue through a safe, patient-centered scope expansion.

2. Whether those health professionals seeking an increased scope of practice currently have or will be required to have didactic and clinical education from accredited professional schools or training from recognized programs that prepare them to perform the proposed scope of practice, and details on what that education or training includes for that proposed scope of practice.

Training requirements are defined in Arizona Administrative Code R4-16-401:

- A. *After the effective date of this Section, a supervising physician or physician assistant shall ensure that before a medical assistant is employed, the medical assistant completes either:*
 1. *An approved training program identified in R4-16-101; or*
 2. *An unapproved training program and successfully passes the medical assistant examination administered by a certifying organization accredited by either the National Commission for Certifying Agencies or the American National Standards Institute.*
- B. *This Section does not apply to any person who:*

1. *Before February 2, 2000:*
 - a. *Completed an unapproved medical assistant training program and was employed as a medical assistant after program completion; or*
 - b. *Was directly supervised by the same physician, physician group, or physician assistant for a minimum of 2000 hours; or*
2. *Completes a United States Armed Forces medical services training program. Educational requirements for medical assistants are defined by The Commission on Accreditation of Allied Health Education Programs (CAAHEP) and The Accrediting Bureau of Health Education Schools (ABHES).*

Educational requirements for medical assistants are defined by The Commission on Accreditation of Allied Health Education Programs (CAAHEP) and The Accrediting Bureau of Health Education Schools.

The administrative duties proposed are already in the scope of practice for a MA, this will only allow them to be performed without direct supervision.

3. Whether the subject matter of the proposed increased scope of practice is currently tested by nationally recognized and accepted examinations for applicants for professional licensure and the details of the examination relating to the increased scope of practice.

The administrative duties proposed are already in the scope of practice for a MA and therefore included by nationally recognized and accepted examinations and training programs. This proposed change will only allow them to be performed without direct supervision.

The MA examination is a rigorous exam that requires a thorough understanding of health care delivery and is open to candidates who have completed a CAAHEP or ABHES program or who have completed an eligible alternative pathway. Credentials must be recertified every 60 months by continuing education or exam.

Additionally, pursuant to HB2266 (medical assistants; training requirements), which was signed in to law in 2021, an MA may complete a training program designed and offered by a physician. The Arizona Medical Board has posted the rules to implement, but they have not yet been finalized.

4. The extent to which the proposed increased scope of practice will impact the practice of those who are currently licensed in this state or the entry into practice of those individuals who have relocated from other states with substantially equivalent requirements for registration, certification or licensure as this state.

As these administrative duties are already within the scope of practice for MAs and the proposal only allows them to perform certain duties unsupervised, it will have no negative impact on those who are currently working in Arizona. In fact, the increased efficiency of the team-based healthcare delivery model will provide benefits for the

entire health care team. The educational and licensure standards are applied nationwide, so those practicing in other states who wish to relocate will be sufficiently prepared to handle these duties unsupervised.

5. The extent to which implementing the proposed increased scope of practice may result in savings or a cost to this state and to the public.

By reclassifying administrative duties under the “unsupervised” Medical Assistant duties, patient safety will be enhanced by removing unnecessary barriers to care and will give patients access to more immediate information. More immediate access to information reviewed by a licensed provider can result in improved patient outcomes by improving turnaround time for important results and recommendations. This can reduce costs as well by reducing delays in care and potentially unnecessary, costly Emergency Department visits. Also, by improving access to information by phone, it can narrow the gap of healthcare disparities in those that do not have the same access to technology. This information is already immediately available to those patients who have portal access to his/her electronic patient records.

6. The relevant health profession licensure laws, if any, in this or other states.

Educational requirements for medical assistants are defined by the CAAHEP and the ABHES, their training requirements are defined in Arizona Administrative Code R4-16-401.

Medical Assistants are regulated pursuant to ARS 32-1456:

Medical assistants; allowable tasks; training; use of title; violation; classification

A. A medical assistant may perform the following medical procedures under the direct supervision of a doctor of medicine, physician assistant or nurse practitioner:

- 1. Take body fluid specimens.*
- 2. Administer injections.*

B. The board by rule may prescribe other medical procedures that a medical assistant may perform under the direct supervision of a doctor of medicine, physician assistant or nurse practitioner on a determination by the board that the procedures may be competently performed by a medical assistant.

C. Without the direct supervision of a doctor of medicine, physician assistant or nurse practitioner, a medical assistant may do the following tasks:

- 1. Perform billing and coding.*
- 2. Verify insurance.*
- 3. Make patient appointments.*
- 4. Perform scheduling.*
- 5. Record a doctor's findings in patient charts and transcribe materials in patient charts and records.*

6. Perform visual acuity screening as part of a routine physical.

7. Take and record patient vital signs and medical history on medical records.

D. The board by rule shall prescribe medical assistant training requirements. The training requirements for a medical assistant may be satisfied through a training program that meets all of the following:

1. Is designed and offered by a physician.

2. Meets or exceeds any of the approved training program requirements specified in rule.

3. Verifies the entry-level competencies of a medical assistant as prescribed by rule.

4. Provides written verification to the individual of successful completion of the training program.

E. A person who uses the title medical assistant or a related abbreviation is guilty of a class 3 misdemeanor unless that person is working as a medical assistant under the direct supervision of a doctor of medicine, physician assistant or nurse practitioner or possesses written verification of successful completion of a training program provided pursuant to subsection D of this section.

7. Recommendations, if any, from the applicable regulatory entity or entities, from the department of health services and from accredited educational or training programs.

None applicable.

Proposed Language

32-1456. Medical assistants; allowable tasks; training; use of title; violation; classification

A. A medical assistant may perform the following medical procedures under the direct supervision of a doctor of medicine, physician assistant or nurse practitioner:

1. Take body fluid specimens.
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B. The board by rule may prescribe other medical procedures that a medical assistant may perform under the direct supervision of a doctor of medicine, physician assistant or nurse practitioner on a determination by the board that the procedures may be competently performed by a medical assistant.

C. Without the direct supervision of a doctor of medicine, physician assistant or nurse practitioner, a medical assistant may do the following tasks:

1. Perform billing and coding.
2. Verify insurance.
3. Make patient appointments.
4. Perform scheduling.
5. Record a doctor's findings in patient charts and transcribe materials in patient charts and records.
6. Perform visual acuity screening as part of a routine physical.
7. Take and record patient vital signs and medical history on medical records.
8. Communicate documented medical advice, documented interpretation of test results, and documented orders from a licensed medical provider.
9. Obtain, process, and communicate medication and/or procedure prior authorization as documented and ordered by a licensed medical provider.



November 1, 2023

The Honorable Warren Petersen
The Honorable Ben Toma
Arizona State Legislature
1700 W. Washington St
Phoenix, AZ 85007

Dear Senate President Petersen and House Speaker Representative Toma,

On behalf of the Arizona Osteopathic Medical Association (AOMA), I am writing to issue support for the sunrise application to increase the scope of practice for medical assistants in Arizona. The Arizona Osteopathic Medical Association has been supporting the needs of physicians and students in Arizona by advocating for and promoting the osteopathic medical profession since 1920. AOMA has more than 2,600 members – active, retired, associates, interns, residents, and students.

As you know, Arizona is facing a growing physician shortage. It is projected that Arizona will be short approximately 2,000 full-time equivalent primary care physicians by 2030.¹ As more people relocate to Arizona and as our population continues to age, this growing shortage will be a serious concern for the State. A multi-year solution for this growing deficit includes increasing the number of physicians that are educated and trained in Arizona, which includes working with public and private partners to drastically increase the number of residency positions in the state. In the short-term, we need to ensure that our physician population can be as efficient as possible, and increasing the scope of practice for medical assistants is one tool that can work towards this goal.

AOMA supports the proposed and limited scope of practice increase for medical assistants. This scope of practice increase includes the ability, as ordered by a licensed medical provider, to communicate documented medical advice, documented interpretations of tests, and documented orders from a licensed medical provider; and to obtain, process, and communicate prior authorizations as documented without the direct supervision of a physician. The proposed change will allow medical assistants the ability to address general administrative issues that are currently handled by physicians. This will reduce the administrative burden for physicians and increase the time available for physicians to provide direct patient care.

On behalf of AOMA, I appreciate the opportunity to offer our support for this proposal.

Sincerely,

A handwritten signature in black ink that reads 'Matt Helms'. The signature is written in a cursive, flowing style.

Matt Helms
Executive Director, Arizona Osteopathic Medical Association

¹ <https://crh.arizona.edu/news/arizona-cant-keep-demand-doctors-heres-why>

November 1, 2023

The Honorable Warren Petersen
1700 West Washington
Phoenix, Arizona 85007

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Phoenix, Arizona 85007

On behalf of the Arizona Nurses Association (AzNA), we respectfully ask for your support of the Sunrise Application to allow the addition of some specific administrative duties to be performed by Medical Assistants (MAs) in order to alleviate the administrative burden placed on physicians, nurses and other clinical staff and to improve patient care.

The Arizona Nurses Association (AzNA) is a statewide voluntary membership-based professional association of licensed nurses. Our members represent all segments of nursing practice, bedside to administration, consulting to advanced practice, and education to legislation. AzNA members come from all practice settings: hospital, home and community health, public health, higher education, long-term care, school health, and policy.

Arizona is experiencing a significant healthcare workforce shortage, including but not limited to nurses and physicians. The lack of healthcare workforce is a threat to healthcare accessibility and quality care for all Arizonans. AzNA works to ensure every nurse in Arizona can realize their personal and professional goals. Collaboration across the healthcare continuum allows for all professions involved in the healthcare space to provide safe, efficient, and effective patient care.

Clinical healthcare workers, including nurses, are spending more and more of their time on administrative tasks when their time is best spent on the direct care of patients. Reducing administrative burden and creating efficiencies within the healthcare delivery models, including team settings, will improve patient care, patient satisfaction, as well as healthcare clinician satisfaction.

We are requesting that MAs scope of practice be increased to include the ability as ordered by a licensed healthcare provider to communicate documented healthcare advice, documented interpretations of tests, and documented orders from a licensed healthcare provider as well as to obtain, process, and communicate prior authorizations as documented without the direct supervision of an appropriate healthcare provider. Small, limited, changes like these will better allow a healthcare provider to lead their care team in a way that creates healthcare delivery efficiencies and the best outcomes for patients.

We support the Arizona Medical Association's request for the consideration of the Sunrise Application to allow Medical Assistants (MAs) to perform specified administrative duties without supervision and request your support.

Sincerely,



Heidi Sanborn, DNP, RN, CNE
President, Arizona Nurses Association

November 1, 2023

The Honorable Warren Petersen
1700 West Washington
Phoenix, Arizona 85007

The Honorable Ben Toma
1700 West Washington
Phoenix, Arizona 85007

On behalf of the Arizona State Association of Physician Assistants, which represents Physician Assistants (PAs) in all medical specialties across the state, we respectfully ask for your support of the Arizona Medical Association's Sunrise Application to allow the addition of some specific administrative duties to be performed by Medical Assistants (MAs) in order to alleviate administrative burdens and to improve patient care.

Arizona is experiencing a significant healthcare worker shortage, which greatly impacts healthcare accessibility for all Arizonans. Job dissatisfaction and burnout amongst PAs and other provider types is often attributed in large part to the heavy burden we spend on purely administrative tasks, taking time away from our patients' care. Reducing administrative burden and creating efficiencies within the healthcare delivery models will improve patient care, patient satisfaction, access to care, as well as PA job satisfaction and retention.

We are requesting that MAs scope of practice be increased to include the ability as ordered by a licensed medical provider to communicate documented medical advice, documented interpretations of tests, and documented orders from a licensed medical provider as well as to obtain, process, and communicate prior authorizations as documented without the direct supervision of a licensed medical provider.

This change will allow for greater flexibility in PA scheduling and update the regulations to more accurately reflect how MAs work in today's healthcare model. Therefore, we support the Arizona Medical Association's request for the consideration of the Sunrise Application to allow Medical Assistants (MAs) to perform specified administrative duties without supervision and request your support.

Sincerely,



Kevin R. Kupferer, PA-C, DHSc

President, Arizona State Association of
Physician Assistants

November 1, 2023

The Honorable Warren Petersen

The Honorable Ben Toma

1700 West Washington

Phoenix, Arizona 85007

Dear Senate President Petersen and House Speaker Representative Toma:

On behalf of the Health System Alliance of Arizona, which represents the major hospital and health systems in the state, we respectfully ask for your support of the Sunrise Application to allow the addition of some specific administrative duties to be performed by Medical Assistants (MAs) in order to alleviate the administrative burden placed on physicians, nurses, and other clinical staff and to improve patient care.

Arizona is experiencing a significant healthcare workforce shortage which greatly impacts healthcare accessibility for all Arizonans. We need to work together to retain and grow the number of physicians, nurses, and allied health professionals in our state.

A top area of staff dissatisfaction, which often results in burnout, is the tremendous amount of time clinical staff are spending on administrative tasks. The highest and best use of physician, physician assistant, nurses, and other clinical team members' time is on direct patient care. Reducing administrative burden and creating efficiencies within the healthcare delivery models will improve patient care, improve patient satisfaction, as well as improve clinical team members' satisfaction.

We are requesting that MAs scope of practice be increased to include the ability as ordered by a licensed medical provider to communicate documented medical advice, documented interpretations of tests, and documented orders from a licensed medical provider as well as to obtain, process, and communicate prior authorizations as documented without the direct supervision of a physician.

This change is incremental, but collectively, changes like these will better allow a physician to lead their teams in a way that creates healthcare delivery efficiencies and the best outcomes for patients.

We support the Arizona Medical Association's request for the consideration of the Sunrise Application to allow Medical Assistants (MAs) to perform specified administrative duties without supervision and request your support.

Respectfully,



Brittney Kaufmann

CEO, Health System Alliance of Arizona

November 1, 2023
The Honorable Warren Petersen
1700 West Washington
Phoenix, Arizona 85007

The Honorable Ben Toma
1700 West Washington
Phoenix, Arizona 85007

On behalf of the HonorHealth, whose mission is to improve the health and well-being of those we serve, we respectfully ask for your support of the Sunrise Application. This will significantly alleviate the administrative burden on physicians and other frontline providers and enhance patient care by allowing Medical Assistants to perform specific, but limited duties formerly performed only by physicians.

In order to address the significant physician shortage in Arizona, we must help create a healthcare environment that will retain our current physicians and encourage new physicians to practice in our communities. Arizona is facing a significant healthcare workforce shortage as evidenced by the shortage of primary care physicians in the Bureau of Health Workforce Health Resources and Services Administration (HRSA) U.S. Department of Health & Human Services report December 31, 2022 that states Arizona only meets 39% of the state need and requires 667 more primary care physicians. With the rapid population growth and aging of our communities, this number is expected to grow. Working collaboratively, we can ameliorate the areas of dissatisfaction that physicians experience. One key area for improvement involves the inordinate amount of time that is spent on administrative tasks. This burden is the top area of physician concern and significantly contributes to burnout in our caregivers. Spending more time on direct patient best utilizes the specialized skills of our doctors, allows them to find joy in their work, and enhances the care and satisfaction of patient. By reducing the administrative load and improving efficiencies in practice in our healthcare systems, we can impact the quadruple aim of healthcare: better quality, lower cost, improve patient satisfaction, and enhanced physician satisfaction.

We support the request to make a change in the MAs scope of practice be to include the ability as ordered by a licensed medical provider (i) to communicate documented medical advice, documented interpretations of tests, and documented orders from a licensed medical provider and (ii) to obtain, process, and communicate prior authorizations as documented without the direct supervision of a physician.

While this is one small part of what will be required to address the challenges that physicians and other caregivers experience, it is an important step in the right direction. Demonstrating a commitment to improve the healthcare efficiencies of practice even in

small ways can have a meaningful and power influence on the day-to-day healthcare environment for our physicians and our patients.

HonorHealth enthusiastically endorses the Arizona Medical Association's request for the consideration of the Sunrise Application to allow Medical Assistants (MAs) to perform specified administrative duties without supervision and request your support.

Sincerely,

Tiffany C. Pankow, MD

Tiffany Pankow, MD
VP Chief of Caregiver Wellness and Patient Experience