

TESTIMONY OF MAFP PRESIDENT DR. KATHERINE PATTERSON BEFORE THE MISSISSIPPI STATE BOARD OF MEDICAL LICENSURE, MARCH 21, 2018

The Mississippi Academy of Family Physicians represents over 1,050 physicians, residents, and medical students across the state of Mississippi. The Mississippi Academy of Family Physicians firmly believes in a team-based approach to the practice of medicine. We encourage health professionals to work together as multidisciplinary, integrated teams in the best interest of patients. Patients are best served when their care is provided by an integrated practice care team led by a physician. However, as primary care is the main target of these potential regulations, we have several concerns that we feel need to be addressed as the board moves forward.

1. Proposed Regulation in Rule 1.2(B) and Rule 1.5 – We believe these proposed regulations which singles out primary care physicians as defined by Family Practice, General Internal Medicine, and/or General Pediatrics is in violation of state law. Mississippi Code 73-49-1 states “No state board or agency that licenses health care providers shall promulgate or enforce any rule or regulation affecting the practice of its licensees that does not apply equally to the practice of all of its licensees.” Not only is it unlawful for the Board of Medical Licensure to use discriminatory practices that single out specific specialties and the practicing physicians therein but also it unjustly creates two levels of specialties within the practice of medicine where a state agency is implying that a different set of rules applies to certain doctors. It is evident to us that these new regulations should be applied to collaborating physicians across the field of medicine and should not discriminate against these three specialties.
2. Proposed Regulation in Rule 1.5(3) – We feel that requiring EMR limits some primary care doctors from being able to collaborate under these rules. Not all doctors have access to electronic medical records and those doctors should not be punished and prohibited from collaborating under these new rules. Also, regarding EMR, we understand the Board of Medical Licensure does not regulate the advanced practice nurses; however, without requiring the doctors to put in the collaborative agreement that the np must have the same EMR this requirement becomes moot and will not necessarily yield the intended result of having doctors being able to see medical records electronically. If the EMR requirements stay in place, we request language be added requiring the collaborating doctor include the nurse practitioner has the same EMR in the collaborative relationship.
3. Proposed Regulation in Rule 1.5 – We request an addition be added to Rule 1.5 that states, primary care doctors who choose to collaborate within the 75-mileage rule may do so while not adhering to the conditions in Rule 1.5. This is a small clarification that while implied in the regulations is not specifically stated.
4. While this is not addressed in the proposed regulations, we have two suggestions we feel would ensure quality care across the state of Mississippi.
  - a. We would like to request that a collaboration board or subcommittee consisting of primary care doctors be utilized to ensure quality patient care especially if the regulations continue to discriminate and single out primary care physicians; and
  - b. We would like to request an easily accessible database be maintained at the Mississippi Board of Medical Licensure in order to identify collaborative relationships of physicians and nurse practitioners. This information is very difficult to find and is important to ensuring quality patient care and safety.