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May 21, 2024

Majority Leader Sharon Carson  
107 North Main Street  
Room 302  
Concord, NH 03301

Minority Leader Donna Soucy  
107 North Main Street  
Room 120  
Concord, NH 03301

Dear Majority Leader Carson and Minority Leader Soucy,

The American Academy of Neurology (AAN) is the world's largest association of neurologists and neuroscience professionals, with over 40,000 members. The AAN's mission is to enhance member career fulfillment and promote brain health for all. A neurologist is a doctor with specialized training in diagnosing, treating, and managing disorders of the brain and nervous system such as Alzheimer's disease, stroke, concussion, epilepsy, Parkinson's disease, multiple sclerosis, headache, and migraine.

The AAN writes to express our opposition to HB 1222. The AAN understands the important role that advanced practice providers (APPs), such as nurse practitioners (NPs) and physician assistants (PAs), play in neurologic care. The creation of care teams and models of care in the field of neurology, which include APPs is crucial to improving access, quality, and continuity of care for people with neurologic disease. However, to ensure the quality of care for our patients, it is extremely important that the neurology care team be led by a physician who is a board-certified neurologist.

This bill would undermine that physician-led neurology care team model by expanding the scope of practice for Physician Assistants. If passed, HB 1222 would allow physician assistants to perform tasks and services outside of their education and training, and could result in increased costs, and a lower quality of care.

While we understand the intention of expanding access to care for patients in New Hampshire our concern stems from the difference in education between APPs and physicians. **APPs do not replace the need for neurologists.**

- Physicians complete **four years of medical school** followed by **three to seven years of residency** training. That training includes over **15,000 clinical training hours**. For physicians specializing in neurology there are often several additional years of subspecialty fellowship training to better treat specific neurologic conditions.
- PAs complete two to two and a half years of graduate level education with no residency training requirement and 2,000 hours of clinical care.

The stark difference in training levels underscores the need to maintain a physician lead care team. The training our neurologist members receive equips them to handle any clinical scenario within the scope of neurology and appropriately advise

APPs on the best course of treatment for their patients with neurologic conditions. Rather than increasing access, removing physician supervision of APPs would result in a lower quality of care for patients. Studies show that nonphysician providers are more likely to rely on services compared to their physician counterparts by ordering additional tests, referring patients to numerous specialists, and admitting patients to the emergency department more often than necessary.<sup>1</sup> Care provided primarily by PAs and NPs was shown to increase the cost of care by \$43 per patient per month, leading to more than \$10 million in additional annual spending.

Additionally, data shows that allowing APPs independent practice does not increase access to care in underserved areas.<sup>1</sup> In states where APPs are allowed to practice without physician supervision, we can see that they open their practices in the same areas where physicians already have established practices, failing to address health care shortages in rural or underserved areas.

While the AAN fully supports the inclusion of APPs as part of a care team, it is vitally important for a physician to remain the head of that care team to ensure that patients are receiving the highest quality of care. Therefore, we oppose HB 1222 and ask that New Hampshire not pass this bill that would significantly alter the care patients in New Hampshire receive. If you have any questions about our opposition to this bill, please contact Grant Niver, Senior State Affairs Program Manager, at [gniver@aan.com](mailto:gniver@aan.com). We look forward to continuing to work with you to ensure patients have access to quality neurologic care.

Sincerely,

A handwritten signature in black ink that reads "Carlayne Jackson". The signature is written in a cursive, flowing style.

Carlayne E. Jackson, MD, FAAN  
President, American Academy of Neurology

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<sup>1</sup> <https://www.ama-assn.org/system/files/scope-of-practice-access-to-care-for-patients.pdf>