

TO: Members of the Senate General Government and Agency Review Committee

FROM: The Ohio Provider Coalition

DATE: February 12, 2020

RE: Senate Bill 246

Chairman Schuring, Vice Chairman Rulli, Ranking Member O'Brien and members of the committee, on behalf of tens of thousands of Ohio health care professionals represented by the Ohio Healthcare Provider Coalition, we are writing to express our concerns with Senate Bill 246 as currently drafted. While admirably aimed at promoting professional portability across states, we believe that several sections of the bill as drafted could put Ohio patients at risk.

We truly appreciate efforts by the Ohio General Assembly and other interested parties in making Ohio a state where all professions seek to locate. Not only are the individual members of the organizations represented in this letter licensed health care professionals providing vital health care services to all Ohioans, but many are also business owners in communities throughout the state and appreciate a welcoming business climate.

However, we strongly believe that SB 246 is more applicable to professions outside of the health care field where barriers may exist that make it difficult to relocate to Ohio. Our organizations are unaware of non-resident practitioners in our professions experiencing unnecessary difficulties in obtaining licensure through our respective Ohio healthcare licensing boards. In fact, many of the licensing boards which govern our professions already have well-established licensure by endorsement or reciprocity statutes and/or rules addressing this issue. These provisions appear to work quite well. Our organizations are not aware of complaints or data indicating that any of these current endorsements or reciprocity standards have caused unnecessary impediments or been a barrier to non-resident healthcare professionals seeking to relocate to Ohio.

Outsourcing our state's licensure responsibility to another entity, including private certifying bodies, for healthcare professionals is not sound public policy and potentially places Ohioans at risk of physical harm. The inclusion of private certifying bodies is particularly troublesome in the healthcare arena as these entities are not well-defined in the legislation and could open the door to practitioners with substandard education and training credentials practicing in Ohio. This may be appropriate in some areas of Ohio professional credentialing and oversight, but not in healthcare which directly impacts the well-being of Ohioans.

The scope of practice of healthcare professions, as well as their educational and training requirements, varies widely amongst states. While Ohio has set standards in these areas, SB 246 as drafted would allow (and even mandate) practitioners from other states who lack the requisite education, training and/or experience required to practice at our state's designated scope of practice to obtain an Ohio license, and to practice under our standards which are sometimes more advanced. An even more

troublesome aspect of this is that this scenario could be allowed to occur in professions which have the ability to prescribe controlled substances. As drafted, HB 246 would allow practitioners who are not authorized to prescribe in their current state or jurisdiction the ability to issue prescriptions in Ohio. This is not acceptable for Ohio patients.

For these reasons, we respectfully request that you consider amending SB 246 to create an exclusion for professionals licensed or credentialed under Ohio Revised Code sections 4715, 4725, 4729, 4731, 4732 and 4734 respectively.

Again, our organizations understand that unnecessary barriers to licensure might exist in other professions, but due to the potential risk to the public and the lack of necessity due to the state's current endorsement and/or reciprocity policies in our professions which are working well, we are respectfully requesting exclusion from the provisions of SB 246 for our respective professions.

The Ohio State Medical Association  
The Ohio Dental Association  
The Ohio Optometric Association  
The Ohio Pharmacists Association  
The Ohio Osteopathic Association  
The Ohio Psychological Association  
The Ohio Foot and Ankle Medical Association  
The Ohio State Chiropractic Association