

October 3, 2023

Stefanie Davis
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RE: Proposed Regulations Changes for Physician Assistants

To Whom It May Concern:

For 70 years, the Alaska Hospital & Healthcare Association (AHHA) has served as a non-profit trade association representing Alaska's hospitals, nursing homes, and other healthcare partners across the continuum of care. AHHA members play an invaluable role, both as community providers and essential employers, in cities, towns, and villages across Alaska.

It is well documented that Alaska's healthcare system is severely challenged by workforce shortages, recruitment barriers, and other limitations to access. Physician assistants play an important role on the front lines of our healthcare system, especially in rural Alaska, and are critical to ensuring access to timely and quality healthcare for Alaskans.

After reviewing the proposed changes that seek to change practice requirements for physician assistants in our state, consulting with Alaska hospitals, especially those in rural Alaska, we respectfully oppose the State Medical Board adopting its proposed regulations as written.

Our primary concern with the proposed regulations is the sheer disruption they could cause for access to healthcare services. More specifically, the proposed regulations would require a physician assistant to work not less than 2,400 hours of general medical practice within the two years prior to practicing in rural Alaska. Furthermore, in most instances, that 2,400-hour standard can only be met in an urban setting. This is a stark contrast from the current standards in 12 AAC 40.415, which require 160 hours of practice in direct patient care, a majority of which can be done in a remote practice location.

Maintaining appropriate practice and training standards in the medical profession is crucial. However, we have not heard of or received any widespread complaints about the quality of care provided by physician assistants in rural or urban settings, so to pursue such a drastic departure from the current standards is both surprising and alarming because it could be a deterrent for recruiting these professionals to Alaska.



This scale of a policy shift merits further discussions with all stakeholders, and we respectfully request the proposed regulations not be adopted as written.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J.C. Kosin'.

Jared C. Kosin, JD, MBA
President & CEO