CONCISE EXPLANATORY STATEMENT

In accordance with the Administrative Procedures Act, R.I. Gen. Laws § 42-35-2.6, the following is a concise explanatory statement:

AGENCY: Rhode Island Department of Health

DIVISION: N/A

RULE IDENTIFIER: 216-RICR-20-15-10

RULE TITLE: Primary Care Training Sites Program

REASON FOR RULEMAKING: These regulations are being adopted to fulfill the requirements of R.I. Gen. Laws § 23-17.30-5 which mandates that regulations be adopted for the purpose of implementing the provisions of the Primary Care Training Sites Program.

ANY FINDINGS REQUIRED BY LAW AS A PREEQUISITE TO THE EFFECTIVENESS OF THE RULE: N/A

TESTIMONY AND COMMENTS:

- RIDOH received a comment regarding § 10.3(A)(14), the definition of "Student Enrollee." The comment stated:
    - "This definition appears limited to graduates of medical school. We recommend that the definition be revised to reflect students who have not yet graduated." RIDOH acknowledges this comment. In reviewing the section in question, it was determined that clarifying language would be beneficial. As a result, the wording "enrollee in a clinical course" was added to § 10.3(A)(14).
    - "We also recommend that the definition be more inclusive of the clinical education experience of nurse practitioners and physician assistants." RIDOH notes that these professions are already mentioned. As a result, no changes have been made to the text.

- RIDOH received a comment regarding § 10.4.2(B)(3), Selection Process/Criteria. The comment stated:
    - "The requirement that the training program at the primary care site is accredited will limit the eligible training sites. We recommend offering training sites alternatives to accreditation." RIDOH disagrees with the comment, as the Primary Care Training Site Program is designed to provide training for students pursuing education that would qualify them for licensure in Rhode Island. Because graduation from an accredited Nurse Practitioner, Physician Assistant or Physician program is a

requirement for licensure, the primary care training would also need to be accredited as a necessary component of that accredited program.

CHANGES TO THE TEXT OF THE RULE:

- § 10.3(A)(14) was revised to read: “Student enrollee” means a student that is enrolled in a program at a Primary Care training site to receive medical training in primary care as an intern, **enrollee in a clinical course**, resident, or fellow as part of the clinical training requirements for physicians, nurse practitioners, and physician assistants.

REGULATORY ANALYSIS:

In development of this rule, consideration was given to:

1) Alternative approaches;

2) Overlap or duplication with other statutory and regulatory provisions; and

3) Significant economic impact on small business

No alternative approach, duplication or overlap was identified based on available information. RIDOH has determined that the benefits of the rule justify its costs.