



November 17, 2005

Board of Medical Examiners
P.O. Box 200513
Helena, MT 59620-0513

RE: Comments on proposed NEW RULE I pertaining to medical assistants

AARP is a strong advocate for improving health care quality and reducing the rate of medical errors. The Institute of Medicine estimates that medical error is the leading cause of death and that injuries resulting from medical errors cost billions each year. A recent survey by the Kaiser Family Foundation found that one in three individuals reported that a preventable medical error was made in their care or that of someone in their family. In addition, AARP policy supports high standards for licensing, regulation, and oversight of all health care personnel. Given the frequency of medical errors in our health care system, we urge the Board of Medical Examiners, and all policymakers, to set high standards for formal training, supervision, appropriate practice setting, and continuing competency assessment of those providing care to Montana patients.

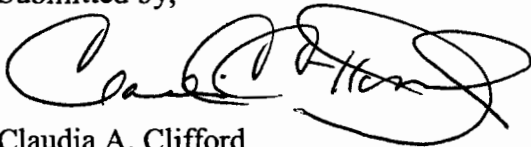
Overall, AARP Montana is concerned that proposed RULE I does not assure that medical assistants will be adequately trained, and delegated appropriate tasks in appropriate settings to assure quality health care. We fear that these rules will increase the rate of medical errors in Montana. Specifically we have the following concerns:

- NEW RULE I (6) allows for medical assistants with no formal training to care for patients. All health care personnel should be required to have some level of formal training and continuing competency assessment. It is not safe for the patients of Montana to be cared for by medical assistants who have only on-the-job instruction and no certification or competency examinations. Your rule allows medical assistants to perform invasive procedures and administer medications, including allergy testing. To do so without formal training is not the quality of care expected by Montana consumers.
- NEW RULE I (3) allows medical assistants to perform any kind of invasive procedure, administer any medication delegated by a physician. It does not seem safe or appropriate for untrained individuals to do either. We question if even certified medical assistants have the expertise to safely perform invasive procedures and administer any medication.
- NEW RULE I (7) allows medical assistants to care for patients not admitted to the hospital, in other words they could care for patients in outpatient surgery and emergency rooms. Some of the most acute and fragile people are patients in emergency rooms and outpatient surgery. The Board should guarantee that health care personnel working in emergency settings and out patient surgery be highly trained professionals. The rule should specifically exclude medical assistants from

working in these settings. This rule would certainly diminish the standards for quality care in Montana hospitals. In addition, this rule allows medical assistants to monitor conscious sedation and administer fluids, blood products or medication through an IV, procedures that are risky for patients. This standard does not assure high quality, safe care.

Health care is very expensive. Consumers expect and deserve standards that strive to assure safe, high quality care. The Board of Medical Examiners has the duty to minimize medical error and improve quality of care. We do not believe that these rules honor either of these goals and should not be adopted as proposed.

Submitted by,

A handwritten signature in black ink, appearing to read 'Claudia A. Clifford', written over a white background.

Claudia A. Clifford
Associate State Director of Advocacy
AARP Montana

AARP is a non-profit, non-partisan organization dedicated to making life better for people over age 50. AARP, a consumer and health advocacy organization, has 36 million members nation-wide and 147,000 members in Montana.