



AMERICAN COLLEGE OF PHYSICIANS
INTERNAL MEDICINE | *Doctors for Adults*

Steven E. Weinberger, MD, FACP
*Executive Vice President and
Chief Executive Officer*

Phone: 215-351-2800, Fax: 215-351-2829
Email: sweinberger@acponline.org

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Donald E. Melnick, MD, FACP
National Board of Medical Examiners
3750 Market Street
Philadelphia, PA 19104-3102

Dear Dr. Melnick,

Thank you for your letter of December 21, 2010 in response to our comments regarding the draft NBME Policy document regarding the health professions workforce. We appreciate the changes made to proposed Policy #6, but we remain alarmed that this position, as well as the document as a whole, continues to blur the lines between physicians and nurse practitioners.

We feel strongly that physicians and nurses are not interchangeable, and that optimal care for patients is provided by physicians, nurses, and other health professionals working together in a team-based model of care delivery. The training, skills and experience of Advanced Practice Nurses (APRNs) are not equivalent to those of primary care physicians. "Primary care" includes a wide variety of clinical responsibilities – preventive ("wellness") care; diagnosis and management of straightforward, acute illnesses; diagnosis of undifferentiated presentations that are not straightforward; ongoing management of a single, chronic problem; ongoing management of a patient with complex and interacting medical problems, etc. We believe that some aspects of primary care – such as the diagnosis of undifferentiated presentations that are not straightforward, and the ongoing management of patients with complex and interacting medical problems – require more extensive clinical training, exposure, and experience, and are most appropriately handled by a physician with in-depth training throughout medical school and residency. Accordingly, we remain opposed to using the same tests for licensure, re-licensure, or certification of physicians and APRNs or DNPs. We remain convinced that certification examinations for these different disciplines should be carefully constructed so as to avoid any appearance of equivalency.

We appreciate your invitation to provide additional comments for consideration by the NBME's board of directors when it reviews the draft again at its meeting in late January. We hope that our comments will prompt further refinements prior to final adoption.

Sincerely,

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

Steven Weinberger, MD, FACP
Executive Vice President and Chief Executive Officer