



Physicians Caring for Texans

**House Committee on Public Health
Testimony by Rebekah Bernard, MD,
for the Texas Medical Association
Regarding House Bill 3794
*April 14, 2025***

My name is Dr. Rebekah Bernard, and I am a family physician in Fort Myers, Florida. I am a national expert on scope of practice, with two published books on the topic. What I discovered in my research is that despite 50 years of data and decades of unsupervised practice in many states, there has never been a single large-scale study proving the safety and efficacy of nurse practitioners (NPs) treating “typical” patients without physician oversight.ⁱ

However, I found many studies showing concerns about NP care, including increasing the cost of careⁱⁱⁱⁱ and prescribing more medications^{v vi}, such as unnecessary antibiotics^{vii}, antipsychotics to children^{viii}, and opioids, especially in independent practice states, where NPs are 20 times more likely to overprescribe opioids than physicians^{ix}.

These differences should not come as a surprise: Nurse practitioners receive just 5% of the training of a physician,^x and the model was never designed for nurses to practice without supervision. Today, 60% of family nurse practitioner students attend mostly or completely online training,^{xi} and 22% attend direct-entry programs, which means they can become an NP without ever having worked a day as a nurse.^{xii}

In 2019, my state of Florida granted unsupervised practice to nurse practitioners to work in primary care only. The idea was to increase NPs in rural areas, but when we analyzed the data a few months ago, we actually found that we now have fewer NPs in rural areas than before independent practice was instituted.^{xiii} We also discovered that 59% of nurses practicing without supervision were not working in primary care, as required by Florida law. Instead, most of these nurses were working in med-spas.^{xiv}

While I applaud and share your desire to increase access to quality medical care for all Texans, the evidence is clear that allowing the unsupervised practice of medicine for nurses is not the answer.

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- ^x Primary Care Coalition. Practitioners Issue Brief: Collaboration between Physicians and Nurses Works. Compare the Education Gaps between Primary Care Physicians and Nurse Practitioners. [PDF File] Retrieved from <https://www.tafp.org/Media/Default/Downloads/advocacy/scopeeducation.pdf>. Accessed June 9, 202
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- ^{xii} *ibid*
- ^{xiii} Florida Medical Association, 2024.
- ^{xiv} Florida Medical Association, 2025.