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Scope of Practice Partnership

March 24, 2009

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

Dear Dr. Melnick:

Thank you for the National Board of Medical Examiners' (NBME) participation in the recent AMA State Legislative Strategy Conference. Dr. Richard Hawkins' presentation on NBME's involvement in the Doctor of Nursing Practice (DNP) certification examination process was very informative. We especially appreciated Dr. Hawkins' emphasis on the NBME's commitment to the accurate representation of the NBME's involvement and the issue of equivalency between the DNP certification and physician licensing examinations.

In light of recent events, however, the AMA and the undersigned organizations are very dismayed that the NBME's involvement in the DNP certification examination process continues to be used to draw untrue comparisons of equivalency between physician and DNP examinations as well as their respective competencies. As such, we thank you for the opportunity to set forth these concerns.

In their January 30, 2009 announcement of the results of the first DNP certification exam, the American Board of Comprehensive Care (ABCC) stated:

"The ABCC exam was comparable in content, similar in format and measured the same set of competencies and applied similar performance standards as Step 3 of the United States Medical Licensing Examination, which is administered to physicians as one component of qualifying for licensure." (emphasis added)

American Academy of
Dermatology Association

American Academy of Family
Physicians

American Academy of
Ophthalmology

American Academy of
Orthopaedic Surgeons

American Academy of
Otolaryngology -- Head
and Neck Surgery

American Academy of Physical
Medicine & Rehabilitation

American College of Obstetricians
& Gynecologists

American College of Surgeons

American Medical Association

American Osteopathic Association

American Psychiatric Association

American Society of
Anesthesiologists

American Society of
Plastic Surgeons

California Medical Association

College of American Pathologists

Colorado Medical Society

Maine Medical Association

Massachusetts Medical Society

New Mexico Medical Society

Medical Society of the State of
New York

North Carolina Medical Society

Pennsylvania Medical Society

Texas Medical Association

Utah Medical Association

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We feel that the use of the terms emphasized above are misleading to the public. This statement strongly implies equivalency between physicians taking the USMLE Step 3 exam and DNP candidates. This is unacceptable to us and should be to the NBME as well, given NBME's own admission that such equivalency does not exist.

Beyond statements like this from the ABCC itself, nursing advocates have used the NBME's involvement and the ABCC's statements to take these misrepresentations even further. For example, while discussing the NBME/ABCC exam in the January 16th issue of the Chronicle of Higher Education, Mary O'Neil Mundinger, DrPH, RN, Dean of Columbia University School of Nursing is quoted as saying:

"If nurses can show they can pass the same test at the same level of competency, there's no rational argument for reimbursing them at a lower rate of giving them less authority in caring for patients." (emphasis added)

This type of statement, in conjunction with a discussion of the NBME DNP certification exam, alleges equivalency between the DNP certification and the physician licensing examinations, both in the context of the examination itself, as well as resulting practitioner competency.

From organized medicine's perspective, the omission of a statement from the NBME clearly outlining the NBME's position relating to the differences between the DNP and physician examinations as well as the competency of the respective practitioners based on their educational prerequisites and examinations, implies the NBME's endorsement of these types of misleading and dangerous assertions.

We, therefore, concur with the Council of Medical Specialty Societies, and ask that subsequent language referring to the DNP certification examination, used by ABCC and approved by NBME, state as follows:

"The DNP Certification Examination utilized the test blueprint developed for USMLE Step 3 as a basis for its design, however the resulting design has different dimensions than the Step 3 examination. The exam utilized test items previously used in the USMLE Step 3 examination, but no items in current use in USMLE exam. The exam was shorter than USMLE Step 3, contained a different mix of multiple-choice questions, and did not use the computer-based patient management simulations that are part of USMLE Step 3." (emphasis added)

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Not only is this language consistent with NBME's description of the examination, it goes a long way towards clearing up confusion that may have resulted from statements such as those described above. The public has a right to have a clear understanding of the differences between the two examinations and we believe that this statement is a necessary step towards the clarity patients deserve.

I look forward to hearing from you with regards to this letter and our request. In the meantime, should you have any questions please do not hesitate to contact either myself or Kai Sternstein, JD, Director, AMA Advocacy Resource Center (michaela.sternstein@ama-assn.org or 312-464-5929).

I look forward to our continued dialogue on this critical issue.

Sincerely,

Medical Association of the State of
Alabama
Alaska State Medical Association
American Academy of Dermatology
American Academy of Facial Plastic and
Reconstructive Surgery and the
International Federation of Facial
Plastic Surgery Societies
American Academy of Family
Physicians
American Academy of Ophthalmology
American Academy of Otolaryngology –
Head and Neck Surgery
American Academy of Pediatrics
American Academy of Physical
Medicine and Rehabilitation
American Association of Neuromuscular
& Electrodagnostic Medicine
American College of Obstetricians &
Gynecologists
American College of Surgeons
American Medical Association
American Osteopathic Association

American Psychiatric Association
American Society of Anesthesiologists
American Society for Dermatologic
Surgery
American Society of Plastic Surgeons
Arizona Medical Association
Arkansas Medical Society
California Medical Association
College of American Pathologists
Colorado Medical Society
Connecticut State Medical Society
Medical Society of Delaware
Medical Society of the District of
Columbia
Florida Medical Association
Medical Association of Georgia
Hawaii Medical Association
Idaho Medical Association
Illinois State Medical Society
Indiana State Medical Association
Iowa Medical Society
Kansas Medical Society

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Kentucky Medical Association
Maine Medical Association
MedChi, The Maryland State Medical
Society
Massachusetts Medical Society
Michigan State Medical Society
Minnesota Medical Association
Mississippi State Medical Association
Missouri State Medical Association
Montana Medical Association
Nebraska Medical Association
Nevada State Medical Association
New Hampshire Medical Society
Medical Society of New Jersey
New Mexico Medical Society
Medical Society of the State of New
York
North Carolina Medical Society
North Dakota Medical Association
Ohio State Medical Association
Oklahoma State Medical Association
Oregon Medical Association
Pennsylvania Medical Society
Rhode Island Medical Society
South Carolina Medical Association
South Dakota State Medical Association
Tennessee Medical Association
Texas Medical Association
Utah Medical Association
Vermont Medical Society
Medical Society of Virginia
Washington State Medical Association
West Virginia State Medical Association
Wisconsin Medical Society
Wyoming Medical Society