



AMERICAN OSTEOPATHIC ASSOCIATION
TREATING OUR FAMILY AND YOURS



February 22, 2018

The Honorable Jimmy Holley
Alabama State Senate Government Affairs Committee
11 South Union Street
Suite 732
Montgomery, Alabama 36130

Dear Chairman Holley:

The American Osteopathic Association (AOA) and the Alabama Osteopathic Medical Association (ALOMA) are writing in opposition to HB 166. This bill expands the scope of practice for marriage and family therapists (MFTs) to allow them to diagnose, assess, and treat mental and emotional “disorders,” in addition to treating mental and emotional “problems.” It deletes statutory language prohibiting MFTs from admitting individuals to hospitals and providing treatment for such disorders without medical supervision. It also removes a prohibition on MFTs prescribing medicinal drugs and authorizing radiological or clinical laboratory procedures. The AOA and ALOMA are concerned that such a large increase in scope of practice without commensurate increases in education, training or examination requirements could put the well-being of Alabama patients at risk.

The AOA represents 137,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs/osteopathic medicine can be found at www.osteopathic.org. ALOMA is a professional medical organization that represents over 600 DOs providing patient care in Alabama.

The AOA and ALOMA support the “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. MFTs are trained to help individuals, couples and families improve their relationships and communication through counseling. While we value the contributions of MFTs to the health care delivery system, the AOA and ALOMA believe that the additional services authorized by this bill exceed the scope of MFTs’ education and training. Further, this bill provides no additional education, training or competency demonstration requirements for MFTs.

Osteopathic physicians complete:

- **Four years of medical school** after a **four-year bachelor’s degree**. Medical school education includes **two years of didactic study** totaling upwards of 750 lecture/practice learning hours just within the first two years, **plus two more years of clinical rotations** done in community hospitals, major medical centers and doctors’ offices; and

- **12,000 to 16,000 hours of supervised postgraduate medical education** (“residencies”) completed over the course of **three to seven years**, during which DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions over the course of three to six years.

MFTs licensed in Alabama complete:

- A **two-year** master’s program in Marriage and Family Therapy, which may only include **one course in mental health diagnosis**;¹
- An **examination approved by the Board of Examiners in Marriage and Family Therapy (Board)**, which is comprised of MFTs and public members; and ²
- **200 hours of work experience over two years**, supervised by a Board-approved supervisor.³

This bill:

- **Allows MFTs to diagnose mental and emotional disorders**, in addition to assessing, understanding and treating emotional and mental problems;
- Removes the prohibition on **MFTs admitting persons to hospitals for treatment of the foregoing conditions**;
- Removes the prohibition on **MFTs treating persons in hospitals without medical supervision**;
- Removes the prohibition on **MFTs prescribing medicinal drugs**;
- Removes the prohibition on **MFTs authorizing clinical laboratory procedures or radiological procedures**; and
- Removes the prohibition on **MFTs using electroconvulsive therapy**.

Radiological procedures, including X-rays, pose a potential risk to patient safety, due to the presence of radiation, which can cause cell mutations that may lead to cancer. If the number of clinicians with the ability to order radiological procedures increases, the risk that patients will be exposed to duplicative or otherwise unnecessary procedures also increases. Further, unlike physicians, whose comprehensive medical education and training prepares them to understand the risks and appropriate use of radiological procedures, MFTs are not required to complete any education on procedures.⁴

MFTs are not physicians, and they lack the comprehensive education and training necessary to perform the additional services described in this bill. **We urge you to protect the safety of Alabama’s patients by opposing HB 166.** Should you need any additional information, please feel free to contact Raine Richards, JD, Director, State Government Affairs at rrichards@osteopathic.org or (312) 202-8199.

¹ 536-X-5-.01 Board Course Requirements. Available at: <http://www.mft.alabama.gov/rules.aspx>.

² S 34-17A-8. Application. Available at: <http://www.mft.alabama.gov/law.aspx>.

³ 536-X-2-.02 Requirements for licensure: Licensed Marriage and Family Therapist (LMFT). Available at: http://www.mft.alabama.gov/rules.aspx#CHAPTER_536-X-2.

⁴ See Board Course Requirements *above*.

The Honorable Jimmy Holley

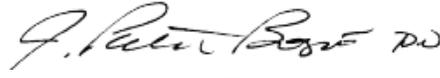
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Sincerely,



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