



March 22, 2017

The Honorable Della Au Belatti
Chairwoman
Hawaii State House Committee on Health
Hawaii State Capitol
Room 402
415 South Beretania Street
Honolulu, Hawaii 96813

Dear Chairwoman Belatti:

The American Osteopathic Association (AOA), the Hawaii Association of Osteopathic Physicians and Surgeons (HAOPS) and the American College of Osteopathic Neurologists and Psychiatrists (ACONP) are writing to urge you to oppose SB 384. This bill would allow clinical psychologists to prescribe psychotropic medication without requiring a level of competency demonstration equivalent to psychiatrists. We believe that this expansion in psychologists' scope of practice is improper, and that all health professionals' scope of practice must be based on their level of training, education and examination.

The AOA represents nearly 130,000 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. HAOPS is a professional medical organization that represents over 300 DOs providing patient care in Hawaii. The ACONP represents 890 osteopathic neurologists and psychiatrists from across the United States.

Psychiatrist osteopathic medical education includes:

- **Four years of medical school**, which includes two years of didactic study totaling upwards of **750 lecture/practice learning hours** within the first two years, plus two more years of clinical rotations done in community hospitals, major medical centers and doctors' offices.
- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.
- Hawaii-licensed psychiatrists must complete **40 continuing medical education hours** per two-year renewal period.

- **Board certified DOs also participate in Osteopathic Continuous Certification**, a process that compares their current practice performance against established benchmarks.

Psychologist education includes:

- **A four-year doctorate degree.**
- Completion of **one year (1,900 hours) of postdoctoral experience.**
- Required to complete **18 hours of continuing Board education** every two years.
- **No program exists to evaluate the professional competence of board certified psychologists over time.**

This bill would:

- **Allow a psychologist to prescribe psychotropic medication** after obtaining a postdoctoral master's degree in clinical psychopharmacology **that requires only 400 hours of didactic education and completing 400 hours of clinical experience.**
- Require a psychologist to **pass an exam that is designed by other psychologists**, who may not have any personal knowledge of safe and effective prescribing practices, before applying for prescriptive authority.
- **Allow psychologists to prescribe in collaboration with an advanced practice registered nurse**, who similarly, lacks comparable expertise to a physician.

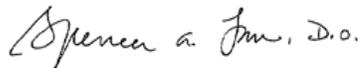
Historically, only physicians have been permitted to independently prescribe medications due to the risk that poor prescribing practices will harm patients. Psychotropic medications present a heightened risk of patient harm because they are among the most powerful drugs available to modern medicine. These medications affect the entire body, not just the brain. Without adequate medical training, psychologists may not recognize underlying medical conditions that can mimic mental illnesses, such as thyroid disorders and tumors of the central nervous system.

A short course in psychopharmacology and passage of an examination designed by other psychologists is a poor substitute for the comprehensive knowledge and skills physicians acquire by completing medical school or osteopathic medical school, obtaining extensive postgraduate clinical experience and participating in substantial continuing education and ongoing professional development. **We urge you to protect the safety of Hawaii's patients by opposing SB 384.** Should you need any additional information, please feel free to contact Nick Schilligo, MS, Associate Vice President, State Government Affairs at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



Boyd R. Buser, DO
President, AOA



Spencer Lau, DO
President, HAOPS



Anthony Emmer, DO, FACN
President, ACONP

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