



March 10, 2017

The Honorable Deborah A. Armstrong
Chairwoman
New Mexico State House Health and Human Services Committee
2015 Dietz Place NW
Albuquerque, NM 87107

Dear Chairwoman Armstrong:

The American Osteopathic Association (AOA) and the New Mexico Osteopathic Medical Association (NMOMA) are writing to urge you to oppose SB 90. This bill expands the scope of practice for clinical psychologists to allow them to prescribe psychotropic medication independent of physician supervision, without requiring them to attain a level of competency equivalent to psychiatrists. The AOA and NMOMA are very concerned that such a large increase in scope of practice for clinical psychologists, without requiring them to attain similar education, training or certification competency to a psychiatrist, may put the health and safety of New Mexico patients at risk.

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. NMOMA is a professional medical organization that represents over 250 osteopathic physicians in New Mexico.

Background:

- Psychology and psychiatry share similar subject matter, but are significantly different. A **psychologist holds a doctorate degree and a license to practice psychology**, while a **psychiatrist is a specialized physician with a DO or MD degree and a license to practice medicine**.
- Historically, **only physicians have been permitted to 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.

Psychiatrist education includes:

- **Four years of medical school**, which 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.
- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where they develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.
- **Strenuous continuing education requirements** for AOA board certified psychiatrists, who participate in Osteopathic Continuous Certification (OCC). This process includes lifelong learning and continuous education, cognitive assessment and practice performance and assessment in order to ensure that board certified DOs maintain currency and demonstrate competency in their specialty area.

Clinical psychologist education includes:

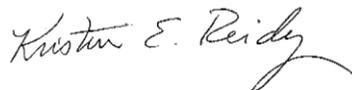
- **A doctoral program** in psychology, to include 450 classroom hours of didactic instruction.
- Passage of an **examination designed by a psychological organization**.
- **3,000 hours of practice supervised by another psychologist**, only two hours per month of which must be in person.
- **Two years of practice** as a conditional prescribing psychologist, previously completed under physician supervision. This bill changes this requirement to **supervision by another non-physician clinician**.

Psychologists do not have the extensive medical education and training that physicians receive that prepares them to understand medical treatment of disease, complex case management and safe prescribing practices. Allowing them to prescribe potentially dangerous medications independent of physician involvement may put the health and safety of New Mexico's patients at risk. **We urge you to protect the safety of New Mexico's patients by opposing SB 90.** 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



Kristin E. Reidy, DO
President, NMOMA

CC: Mark A. Baker, DO, AOA President-elect
William J. Burke, DO, Chair, AOA Department of Governmental Affairs
Richard Thacker, DO, Chair, AOA Bureau of State Government Affairs
Adrienne White-Faines, MPA, AOA Chief Executive Officer
Laura Wooster, MPH, Senior Vice President, AOA Public Policy
Nicholas Schilligo, MS, Associate Vice President, AOA State Government Affairs
Ralph McClish, Executive Director, NMOMA