December 4, 2013

The Honorable Stephen M. Sweeney  
President  
New Jersey Senate  
935 Kings Highway, Suite 400  
West Deptford, NJ 08086  

Re: American Medical Association Opposition to Senate Bill 137  

Dear Senator Sweeney:  

On behalf of the American Medical Association (AMA) and our physician and medical student members, I write in opposition to New Jersey Senate Bill (S.B.) 137, which would inappropriately grant prescriptive authority to psychologists and unprecedented powers to the State Board of Psychology Examiners.  

While the AMA values the role that psychologists play in our nation’s health care system, we do not believe that granting them prescriptive authority is in the best interests of New Jersey’s patients because it will sever the physician-psychologist collaborative relationship and serve to further fragment care.  

**Physicians have 10,000 hours of comprehensive medical education and training**  

Physicians have more than 10,000 hours and 7-to-11 years of clinical education and training to enable them to correctly diagnose, treat and manage patients’ health care needs. In comparison, psychologists are only required to have one year of patient care experience during their training—training that is focused entirely on non-medical therapies.  

In sharp contrast to psychology training, at each stage of a medical student’s education and training, medical students learn how pharmacotherapy integrates into all branches of medicine, such as family medicine and psychiatry, including child and adolescent psychiatry. Physicians are tested on this knowledge as part of the medical licensure process, with particular emphasis on pharmacotherapy in the third and fourth part of the United States Medical Licensing Exam—a series of four examinations that physicians must take and pass in order to be licensed to practice medicine in the United States.  

After graduation from medical school, psychiatric resident physicians spend more than four years learning the complexities related to appropriate prescribing in multiple clinical situations and settings—gaining in-depth knowledge essential to their chosen specialty. Such medical education and training are essential to safely treat patients and independently prescribe psychotropic medications that
are used to treat mental illness and other conditions. There is no equivalent in psychologists’
education and training, even with the additional pharmacologic educational requirements anticipated
in the proposal at issue.

The proposal grants the psychology board unprecedented prescriptive authority

Furthermore, we are greatly concerned that S.B. 137 would grant the New Jersey State Board of
Psychology Examiners the unlimited authority to authorize non-medically trained persons to prescribe
some of the world’s most powerful medications. We note that none of the members of the psychology
board are required to have any direct experience prescribing these powerful medications. How then,
can they know what is "recognized" or "customary" in the pharmacologic treatment of mental and
emotional disorders? By granting such widespread authority, the psychologists’ proposal would do a
grave disservice to New Jersey’s patients.

New Jersey physicians and psychologists practice in same locations

Finally, a review of the practice locations of psychiatrists and other primary care physicians compared
to psychologists’ locations clearly shows that there is no shortage of prescribing professionals in urban
areas of New Jersey. I have attached a map that depicts this for your consideration. We agree that
patients need greater access to care in rural areas, but the data show that psychologists are not any
better geographically situated to serve rural populations than psychiatrists and other primary care
physicians in New Jersey. While we encourage you to continue a dialogue on access to care in rural
New Jersey, we strongly believe S.B. 137 does nothing to address these complex issues.

For these reasons, the AMA opposes S.B. 137. If you have any questions, please contact
Kristin Schleiter, JD, LLM, Senior Legislative Attorney, Advocacy Resource Center, at
kristin.schleiter@ama-assn.org or (312) 464-4783.

Thank you for your consideration.

Sincerely,

James L. Madara, MD

Attachment
cc: Medical Society of New Jersey
    American Psychiatric Association
New Jersey Psychiatrist and Primary Care Physician to Psychologist Distribution Comparison

- = the location of one or more actively practicing Psychiatrists (n = 1,346)
- = the location of one or more actively practicing Primary Care Physicians (n = 7,857)
△ = the location of one or more actively practicing Psychologists (n = 2,546)