

February 3, 2023

The Honorable Ed Buttrey  
Chair, House Business and Labor Committee  
Montana House of Representatives  
708 Central Avenue  
Great Falls, MT 59401-3731

The Honorable Derek Harvey  
Vice Chair, House Business and Labor Committee  
Montana House of Representatives  
P.O. Box 3111  
Butte, MT 59701-3111

Re: **AMA Oppose Montana House Bill 313**

Dear Chair Buttrey and Vice Chair Harvey:

On behalf of the American Medical Association (AMA) and our physician and medical student members, I am writing to express our **strong opposition to House Bill (HB) 313**. This bill would allow physician assistants to practice medicine without any physician involvement. As drafted, HB 313 removes physician supervision of physician assistants entirely and would allow physician assistants to diagnose and treat patients, order and perform x-rays and other diagnostic testing, and prescribe controlled substances, all without attending medical school. This is a dangerous bill that sets Montana apart from almost every other state in the nation. More important—it is not what patients want. **In a recent AMA survey, 95percent of U.S. voters agree physicians should be involved in their medical diagnoses and treatment decisions.** Patients want and expect the most educated and highly trained health care professional to be involved in their care. As such, we strongly encourage you to stand up for patients and oppose HB 313.

### **Physician assistants are valuable members of the physician-led health care team**

The AMA has long valued the commitment of physician assistants to the team-based model of care, and greatly respects the contributions physician assistants make to the health care team. The AMA is deeply concerned that HB 313 eliminates physicians from the care team. In so doing, HB 313 sets Montana apart from most of the country, including 30 states that currently require physician supervision of physician assistants, 18 states that require physician collaboration, and one state that requires a practice agreement. The demolition of physician-led teams proposed by this bill is unprecedented and not in the best interest of patients. As the provision of health care in this country becomes more complex, a fully coordinated, quality-focused and patient-centered health care team will be the optimal means by which Americans will receive their health care. In the physician-led team approach, each member of the team plays a critical role in delivering efficient, accurate, and cost-effective care to patients. The AMA is committed to helping all members of the health care team work together in a coordinated, efficient manner to achieve the triple aim in health care: ensure that Montana's patients receive the highest quality of health care, at the lowest cost, resulting in the most optimal clinical outcomes. Simply put, HB 313 is contrary to this goal.

Scope of practice for any health care professional should be based on standardized, adequate training, and demonstrated competence in patient care. The well-proven pathways of education and training for physicians include medical school and residency, and years of caring for patients under the expert guidance of medical faculty. Physicians complete more than 10,000 hours of clinical education and training during their four years of medical school and three-to-seven years of residency training. By sharp contrast, the current physician assistant education model is two years in length with 2,000 hours of clinical care—and it

includes no residency requirement. The physician assistant education model assumes that in practice, physician assistants will engage in supervision by, or collaboration with, a physician.

Moreover, many physician assistants may not anticipate the degree of independent practice provided by this bill. Many physician assistant students are under the impression that upon graduation they will be practicing under a high degree of physician collaboration, which may decrease as they gain experience. In fact, Physician Assistant Education Association (PAEA) data indicate that 91 percent of physician assistant students nearing graduation described the collaborating physician relationship as “essential” or “very important.” The AMA agrees, and as such, encourages the Business and Labor Committee to oppose HB 313.

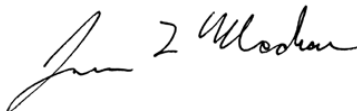
**Authorizing physician assistants to prescribe controlled substances puts patients at risk**

In addition to the above, the AMA is extremely concerned with language in HB 313 that would allow physician assistants to prescribe controlled substances, coupled with the fact this will now be permitted without any physician oversight. There is strong evidence that expanding prescriptive authority for physician assistants has resulted in an increase in opioid prescriptions. A 2020 study published in the Journal of General Internal Medicine found that 8.4 percent of physician assistants prescribed opioids to more than 50 percent of their patients, compared to just 1.3 percent of physicians. They also found that nurse practitioners and physician assistants, in states with independent prescriptive authority for schedule II opioids, were 20 times more likely to overprescribe opioids compared to nurse practitioners and physician assistants in states with restricted prescription programs. It is important to note that the study also found that from 2013 to 2017 almost every other medical specialty decreased opioid prescribing while nurse practitioners and physician assistants increased opioid prescribing. We believe you will agree that these results are startling, yet they are indicative of the significant risk patients in Montana will face if HB 313 becomes law.

For all of the reasons stated above, the AMA stands in strong opposition to HB 313 as written. We urge you to oppose HB 313, as well.

Thank you for your consideration. If you have any questions, please contact Kimberly Horvath, JD, Senior Attorney, AMA Advocacy Resource Center, at [kimberly.horvath@ama-assn.org](mailto:kimberly.horvath@ama-assn.org).

Sincerely,



James L. Madara, MD

cc: Montana Medical Association