



TO: Public Health Committee

FROM: CT American Academy of Pediatrics, CT Council of Child & Adolescence Psychiatry, CT State Medical Society, CT Psychiatric Society, CT Advance Practice Registered Nurse Society

RE: SB 966 AN ACT CONCERNING THE PRESCRIPTIVE AUTHORITY OF PSYCHOLOGISTS

In 2011, the CT General Assembly passed a law that required scope issues go in front of the Department of Public Health to assess the scope of practice expansion. Our organizations participated in the scope of practice hearing in 2017 requested by the CT Psychological Association.

Below is information on those statues, and, DPH's executive summary on that scope expansion specifically.

While there is testimony this morning on why we object to allowing psychologists to prescribe, we are also concerned that the existing statues are not being followed and by-passing this process will lead to the demise of the established and agreed upon manner of deciding these requests.

The Department of Public Health (DPH) is responsible for receiving requests and for establishing and providing support to the review committees, within available appropriations.

Any person, acting on behalf of a health care profession, can seek to establish a new scope of practice or change a profession's scope of practice by submitting a written scope of practice request to the Department of Public Health (DPH).

[Connecticut General Statutes 19a-16d - 19a-16f](#), established a process for the submission and review of requests from health care professions seeking to revise or establish a scope of practice prior to consideration by the General Assembly. Under the provisions of these sections of the Connecticut General Statutes, the scope of practice review committees may review and evaluate these requests and provide findings to the joint standing committee of the General Assembly having cognizance of matters relating to public health.

In 2017, The CT Psychological Association submitted to DPH its request for a scope of practice expansion.

DPH Executive Summary:

DPH in accordance with Connecticut General Statutes (CGS) Sections 19ad through 19a-16f, reported that the Connecticut Psychological Association (CPA) submitted a scope of practice request to the

Department of Public Health to provide prescriptive authority to doctoral level psychologists who obtain a Master of Science degree in psychopharmacology.

A scope of practice review committee was established to review and evaluate the request as well as subsequent written responses to the request and additional information that was gathered through the review process. The scope of practice review committee included medical and nursing organizations, the Connecticut Hospital Association, and the CPA.

In reviewing and evaluating the information presented, the scope of practice committee primarily focused on assessing public health and safety risks associated with the request, whether the request could enhance the access to quality and affordable health care, and whether the request enhances the ability of the profession to practice to the full extent of the profession's education and training.

The CPA described its request for prescriptive authority as one mechanism to address the shortage of psychopharmacologic prescribers amidst the growing number of people in need of mental health care and psychopharmacologic medication. The CPA cited frequent challenges for patients trying to find a prescriber, including long wait lists when a provider is identified. Other challenges in access to mental health care cited by CPA include the aging physician population, and declining participation of psychiatrists in public and private insurance plans. The CPA sees allowing appropriately credentialed psychologists to prescribe improve access to both integrated and comprehensive mental health services, including for disadvantaged populations. The CPA presented information to the review committee on topics including the proposed psychopharmacology curriculum, regional and national trends on psychologists prescribing, and the lack of documented patient safety issues related to psychologist prescribing. The CPA also emphasized the importance of a psychologist experiencing a supervised practicum with a licensed physician or APRN prior to being certified to prescribe.

The Connecticut Hospital Association was open to the concept as a mechanism to help improve the current mental health system, as long as quality and safety are not compromised.

However, the rest of the organizations that participated on the committee felt that a profession without formal medical or nursing training does not possess the knowledge and skills to appropriately and safely prescribe.

The review committee was unable to reach a consensus on a pathway to prescribing for psychologists.