



Monday, May 15, 2023

To: New York State Legislators

**Memorandum of Opposition (S66-A/A1262-A)**

*An act to amend the education law, in relation to collaborative prescriptive authority for psychologists*

The New York State Society of Plastic Surgeons urges you to reject this legislation granting prescriptive authority to the profession of psychology, which we believe poses a serious threat to the health and safety of mentally ill patients receiving or requiring psychotropic and other medications as a critical component of their treatment and continuity of care.

The decision to prescribe psychotropic medication for patients is reached only after medical evaluation and diagnosis, including differential diagnoses to assess for other serious health conditions that may be causing mental illness or manifesting as psychiatric symptomatology. In addition, prescribers must carefully review possible side effects and drug interactions, particularly in the case of patients with other co-morbid conditions who may be taking multiple medications.

To protect patients, it is imperative that these complex determinations should be made only by those with the appropriate medical education, training, and experience, such as a psychiatrist who is required to complete four years of undergraduate study, four years of medical school and four years of psychiatric residency focusing on the treatment of mental illness, including psychopharmacology. This comprehensive education and training totals 16,000 hours of clinical patient care hours. There is no substitute for this type of training and experience.

Conversely, this bill suggests that it is adequate to replace this extensive training with a doctoral degree, a one-to-two-year master's degree in psychopharmacology, a clinical practicum of only 80 hours (2 weeks) and a "passing score" on examination developed by an undefined "nationally recognized body." The necessary prerequisites for the master's degree education program, according to the bill, "shall be determined by the institution that offers such masters level degree." This is a major departure from educational protocols established by the State Education Department (SED), which require professional degree granting institutions to conduct their educational curriculum through a "registered program" acceptable to SED.

While proponents for this legislation contend that psychology prescribing will address gaps in care in rural areas, data from the American Medical Association has determined that psychologists practice primarily in the same areas and regions as primary care physicians and psychiatrists. The profession of psychology itself does not uniformly support psychology prescribing, as found in a recent informal poll of licensed psychologists in New York State.

**For all of the reasons stated above, we strongly oppose this legislation.**