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March 26, 2019

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CEO and Medical Director

Senate Health and Human Services Committee
Arizona Legislature
1700 West Washington Street
Phoenix, AZ 85007

Dear Chair Brophy McGee, Vice Chair Carter, and Members of the Committee,

On behalf of the American Psychiatric Association, a national medical specialty society representing more than 38,500 psychiatric physicians, as well as their patients and families, we urge you to oppose HB 2068, which would authorize clinical nurse specialists (CNSs) to prescribe opioids and other controlled substances without physician involvement, subject to standing orders of a health care institution.

Medicare patient safety requirements at 42 C.F.R. § 410.76 require CNSs to work in collaboration with a physician; in the absence of a state law about collaboration, CNSs must *still* work in collaboration with a physician in order to be reimbursed. HB 2068 does not make sense for Arizona patients. If Medicare – one of the largest payers in our nation – requires CNSs to work in collaboration with physicians, Arizona law should specify this relationship and not leave it to each health care institution to decide.

Proponents of HB 2068 claim independent prescriptive authority is needed to prescribe psychiatric medications. However, it is in the best interest of Arizona patients that medications be prescribed with physician involvement. Powerful psychiatric medications do not stop at the patient's brain; they affect many systems of the body such as the heart, lungs, stomach, and kidneys. There can be seriously disabling or deadly side-effects of the medications if improperly prescribed and managed. Patients needing more than one drug at a time for other physical conditions, such as both heart disease or diabetes and mental illness, are at risk for potentially serious drug interactions. More than half of all patients who have a mental disorder also have one or more physical ailments. The safety of patients and the public must be the primary consideration of each state's licensing agencies and legislature. **For patient safety purposes, it is best that CNS work in a health care team that includes a physician.**

Additionally, HB 2068 would authorize prescribing authority of opioids for CNSs, subject to the standing orders of a health care institution. This means a health care institution could choose to give CNSs independent prescribing authority for opioids.

Arizona is already facing an opioid epidemic, and confronting this epidemic includes making sure opioids are not overprescribed. Adding additional health care providers to the list of those who may prescribe independently – and leaving it up to individual institutions to decide – is not the answer to combatting over-prescription.

We urge you to oppose HB 2068. We would welcome the opportunity to work with you through our partners – the Arizona Psychiatric Society and the Arizona Medical Association – to facilitate evidence-based, proven programs such as the Collaborative Care Model or telehealth that can assist Arizona patients suffering from mental illness, including substance use disorders. Thank you for the opportunity to share our concerns. If you have any questions regarding this information, please contact Erin Philp, Director of State Government Relations, at ephilp@psych.org.

Sincerely,

A handwritten signature in black ink that reads "Saul Levin" followed by "M.D., M.P.A." in smaller letters. There is a horizontal line under the name "Saul".

Saul Levin, M.D., M.P.A.
C.E.O. and Medical Director
American Psychiatric Association