



February 7, 2025

Dear Chairwoman Bolick and Members of the Regulatory Affairs and Government Efficiency Committee:

The organizations listed below represent physicians across the State of Arizona. Together, we urge you to oppose proposed legislation that enables psychologists to prescribe psychotropic medications. As leaders of the healthcare community this proposal is deeply concerning for patient safety and will not effectively address the mental health crisis our state is facing.

Briefly, the proposal would allow psychologists — who are not medically trained — to prescribe powerful medications that are used to treat mental illness. The proposed condensed didactic training is not a safe substitute a physician's extensive medical education. Patients treated for mental illness are often complex and experience multiple medical physical health issues that are treated concurrently. Prescribing psychotropic medications requires a high level of training, as these medications affect the central nervous system, the liver, kidneys, and many other organ systems. Combining these medications with other medications or prescribing them to a patient with an underlying medical illness can be incredibly complicated. For example, cancer and treatments for cancer, such as chemotherapy, can lead to depression. Antidepressant medications can be helpful but may also dangerously interact with chemotherapy drugs - dose adjustments or medication changes based on liver function, kidney function and other drugs prescribed is essential. There can be serious disabling or deadly side effects of medications if improperly prescribed and managed. Medical providers who treat these patients must be trained to understand and treat all systems of the body to recognize the warning signs of adverse effects. The proposal being advanced by the Arizona Psychological Association simply does not include the education and training to do this safely.

While the threats to patients that we have noted should be sufficient to halt this proposal, it is important to note that this proposal will not address the very problem it claims to. Psychologists are not practicing in areas that do not already have licensed psychiatrists and family physicians currently practicing. The argument that this legislation will increase access to care for underserved and rural communities simply does not hold up to any level of scrutiny. Currently many patients struggle to get adequate therapy services, which psychologists are already prepared to provide, and most wait over 6 months for assessments of developmental or neuro-cognitive issues which also fall within the psychologists' current scope of practice. Further, even the few states that have allowed this policy to be enacted have not seen their access to care issues solved.



The physician community is as alarmed by the provider shortage and mental health crisis as everyone else, but we insist that a better, safer way to ensure high-quality care is to utilize telehealth and integrated care services like the Collaborative Care Model. Of course, investments in medical education and training are a key component to addressing the broader issues of the physician shortage, which has already impacted patients by limiting access to care. Further, polling of both Arizona patients and nationwide consistently shows that they prefer a physician-led team for mental healthcare.

When it comes to something as important as healthcare for our families, education, and experience *matter*. With the highest level of education and hands-on training, physician education is:

- Comprehensive: Studying all aspects of the human condition— biological, chemical, pharmacological, and behavioral—in the classroom, laboratory and through direct patient care,
- Hands-on: Rotating through different specialties during medical school, assisting licensed physicians,
- Established and proven: Developing clinical judgment and medical decision-making skills through direct experience managing patients in all aspects of medicine.

The undersigned organizations urge you to oppose legislation allowing psychologists to prescribe. Patient safety must be paramount when considering the change of any law, and this proposal puts some of Arizona's most vulnerable patients at risk of misdiagnosis and unsafe prescribing practices.

Arizona physicians respect and appreciate the role of psychologists in the health care team. We contend that psychologists are direly needed to continue to provide psychotherapy, psychological evaluations and testing that they are extremely well-trained and prepared to do. We stand ready to work with you to address the mental health crisis in our state in a patient-centered, forward-thinking manner.

Respectfully,



Marc Leib, M.D., J.D. Chairman  
Arizona Healthcare Advocacy Coalition

