

May 11, 2022

Chuck Ingoglia, President and CEO National Council for Mental Wellbeing 1400 K Street NW, Suite 400 Washington, DC 2005

RE: Mental Health First Aid

Dear Mr. Ingoglia:

Thank you for The National Council's work to address the stigma of mental health through the *Mental Health First Aid* training course. This course provides valuable training for individuals to learn how to have informed conversations about mental health and communicate in ways that will reduce stigma. BPS is incredibly pleased that pharmacists are part of this program as there are a number of Board-Certified Psychiatric Pharmacists (BCPP) that participate as MHFA faculty. BCPPs in academia are adding MHFA to pharmacy curricula across the U.S. to increase the number of pharmacists who can call themselves "mental health first-aiders."

In reviewing the program, BPS believes that pharmacists specializing in mental health are largely absent as a stated resource in the training. BPS requests that pharmacists, especially Board-Certified Psychiatric Pharmacists, be on the list of those who are a resource to "encourage appropriate professional help" along with psychiatrists, psychologists, social workers, nurse practitioners and physician assistants. More than 1,300 BCPP have advanced training in mental health and demonstrate this specialized knowledge and skills through board certification.

There are multiple reasons for this. The National Council itself recognized BCPPs as a valuable member of the interprofessional healthcare team in the publication <u>Psychiatric Shortage: Causes and Solutions</u>. The profession of pharmacy is one of the most accessible healthcare professions. Pharmacy is really the face of neighborhood healthcare. In fact, 90% of all Americans live within five miles of a community pharmacy.

Pharmacists are uniquely qualified to provide the type of medication and disease management (including behavioral health conditions) services needed to not only stem adverse drug events and medication nonadherence, but also to enhance patient outcomes through improved medication use. Pharmacists offer an in-depth knowledge of medications through clinically based, Doctor of Pharmacy degrees (Pharm.D.). Many, additionally, complete postgraduate residencies and become board certified in a variety of specialties. Pharmacists collaborate with physicians, nurses, and other providers to manage patients' medications and ensure appropriate care transitions, often as part of interprofessional teams.

The Board of Pharmacy Specialties® (BPS) was established in 1976 as an autonomous division of the American Pharmacists Association. Today, BPS is the premier post-licensure certification agency worldwide that operates across the pharmacy profession to provide specialty certification of pharmacists. Most importantly, BPS is above partisan interests and establishes independent, objective standards that are applied in a psychometrically sound, legally defensible process.

BPS has an established commitment to quality and our quality policy states that "BPS is committed to not only meeting the standards to which we are accredited, but to exceed them through a continual process of monitoring all activities and introducing improvements wherever possible."

The principal responsibilities of BPS include:



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- To grant recognition of appropriate pharmacy practice specialties based on criteria established by BPS.
- To establish standards for certification and recertification of pharmacists in recognized pharmacy practice specialties.
- To grant qualified pharmacists certification and recertification in recognized pharmacy practice specialties.
- To serve as a coordinating agency and information clearinghouse for organizations and pharmacists in recognized pharmacy practice specialties.
- To enhance public/consumer protection by developing effective certification programs for specialty practices in pharmacy.

BPS is accredited by two accrediting bodies. BPS received accreditation under the International Organization for Standardization (ISO) 17024 Accreditation Standard. International Accreditation Service (IAS) accredits personnel certification bodies to ISO/IEC Standard 17024. This accreditation provides a global benchmark for personnel certification schemes to operate in a consistent, comparable, and reliable manner worldwide. IAS is a leading accreditation body in the U.S. that is recognized by the International Accreditation Forum (IAF) and Asia Pacific Accreditation Cooperation. As one of the leading accreditation bodies in the United States, IAS is a signatory to the three primary international organizations that form a unified system for evaluating and recognizing competent accreditation bodies worldwide.

BPS is accredited by the National Commission for Certifying Agencies (NCCA) which is the accreditation arm of the Institute for Credentialing Excellence (ICE). The NCCA's Standards for the Accreditation of Certification Programs, which were originally created in the mid-1970s, were the first standards developed by the credentialing industry for professional certification programs. The NCCA Standards were updated in 2021 and more than three hundred certification programs are currently NCCA-accredited.

Accreditation for professional or personnel certification programs provides impartial, third-party validation that the program has met recognized national and international credentialing industry standards for development, implementation, and maintenance of certification programs.

In closing, I want to thank you for your consideration of our request to list pharmacists as a stated resource in the Mental Health First Aid training. For more information about the Psychiatric Pharmacy certification program, please visit <a href="https://www.bpsweb.org/bps-specialties/psychiatric-pharmacy">https://www.bpsweb.org/bps-specialties/psychiatric-pharmacy</a>. If you have any questions or wish to discuss our comments further, please contact me.

Sincerely,

William Ellis, RPh. MS, ICE-CCP

William M. Ellis

**Executive Director** 

<sup>&</sup>lt;sup>1</sup> NCPDP Pharmacy File, ArcGIS Census Tract File. NACDS Economics Department.