



May 19, 2023

Dr. Delphin-Rittmon
Assistant Secretary
Substance Abuse and Mental Health Services Administration
Department of Health and Human Services
5600 Fishers Lane
Rockville, MD 20857

Subject: Request for Assistant Secretary for Mental Health and Substance Use to recognize ACPE to Provide Prescribing Pharmacist Training Required Under the MATE Act

On behalf of the American Association of Psychiatric Pharmacists (AAPP), I write to urge SAMHSA to reconsider its recent guidance implementing the Medication Access and Training Expansion (MATE) Act. AAPP is extremely concerned that training for pharmacists, which requires a tailored training, has been overlooked and should be remedied.

AAPP is a professional association of nearly 3,000 members who envision a world where all individuals living with mental illness, including those with substance use, receive safe, appropriate, and effective treatment. Members are specialty pharmacists, and most are Board Certified Psychiatric Pharmacists (BCPPs) who specialize in psychiatry, substance use disorders (SUDs), and psychopharmacology. They graduate with a Doctor of Pharmacy degree, requiring six to eight years of higher education to complete, and have more training specific to medication use than any other health care professional.

With a significant shortage of mental health care professionals, psychiatric pharmacists offer another resource to improve outcomes for patients through the provision of evidence-based Comprehensive Medication Management (CMM) services. Psychiatric pharmacists have a deep understanding of Medications for Opioid Use Disorder (MOUD) that extends beyond that of most other health care providers. When included in the provision of MOUD services through a collaborative practice arrangement, psychiatric pharmacists' involvement has been demonstrated to improve patient adherence and success with buprenorphine treatment for opioid use disorders; reduce per patient dosage of buprenorphine through improved medication management, monitoring and titration; and reduce overall costs for treating patients with SUDs by relieving providers from delivering services including medication management, counseling, monitoring and follow-up visits.

SAMHSA's [guidance](#) states: "While Section 1263 of the 'Consolidated Appropriations Act of 2023' gave the Assistant Secretary for Mental Health and Substance Use the authority to also approve specific training organizations for this purpose, at the present time, SAMHSA has elected not to undertake a lengthy rulemaking process. This would potentially set up a burdensome system for applications, review and approval. SAMHSA estimates that based on the categories listed above, over 2,000 organizations may be eligible to provide the training."

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AAPP joins our colleagues at the American Pharmacists Association (APhA) in officially requesting that SAMHSA use its authority granted under the 'Consolidated Appropriations Act of 2023' to recognize the Accreditation Council for Pharmacy Education (ACPE) to be able to provide the necessary training for prescribing pharmacists under the new law to avoid limiting patient access in the [10 states](#) that allow pharmacists to prescribe controlled substances/buprenorphine for patients with opioid use disorder, pursuant to varying collaborative practice agreements and practice settings within each state.

These states include: California, Idaho, Massachusetts, Montana, New Mexico, North Carolina, Ohio, Tennessee, Utah and Washington-that would no longer have access to pharmacist prescribing of buprenorphine if ACPE is not recognized to provide the necessary training for prescribing pharmacists. In addition, federal pharmacists, including those at the VA, prescribe controlled substances.

[ACPE](#) sets standards for the education of pharmacists. ACPE is recognized by the U.S. Department on Education as the national agency for the accreditation of professional degree programs in pharmacy. **ACPE also serves as the national agency for the accreditation of providers of continuing education.**

We know Congress did not intend to put in place additional barriers. AAPP believes this recognition should occur outside of a longer process system for applications, review and approval due to the immediacy of the need **to recognize ACPE for training to preserve pharmacist prescribing of buprenorphine. We can't restrict patient access and create new barriers contrary to the purpose of the MATE Act and intention of the U.S. Congress. We urge SAMHSA to use its authority to comport with Congressional intent to remove barriers to pharmacist prescribing of buprenorphine.** We would be happy to meet with you or your staff to discuss this further.

Thank you for all of your efforts to address the public health crises of mental health and addiction. If you have any questions, please do not hesitate to contact me at bschimenti@aapp.org or our Health Policy Consultant, Laura Hanen at lahanen@venable.com.

Sincerely,



Brenda Schimenti
Executive Director