



June 5, 2026

Ohio State Medical Board  
30 E. Broad Street, 3<sup>rd</sup> Floor  
Columbus, OH 43215

Sent electronically to [Nathan.Smith@med.ohio.gov](mailto:Nathan.Smith@med.ohio.gov).

Dear Ohio State Medical Board:

Thank you for the opportunity to comment on the proposed rule package for Certified Mental Health Assistants (CMHAs).

The Academy of Medicine of Cleveland & Northern Ohio (AMCNO), founded in 1824, is the region's professional medical association and the oldest professional association in Ohio. We are a non-profit 501(c)6 representing over 7,300 physicians and medical students from all the contiguous counties in Northern Ohio. We are proud to be the stewards of Cleveland's medical community of the past, present, and future.

The mission of the AMCNO is to support physicians in being strong advocates for all patients and to promote the practice of the highest quality medicine. With that in mind, we offer the following comments.

Ohio needs improved access to mental health care, but access should not come at the expense of patient safety. We believe there is a need for comprehensive medical training, strong supervision, and appropriate safeguards before CMHAs prescribe for and see Ohio patients.

This program as proposed would create a new psychiatric prescriber with a limited curriculum, no independent national board examination comparable to PA or NP certification, and the ability to prescribe psychiatric medications, including controlled substances.

CMHAs may be able to prescribe medications such as stimulants for ADHD, benzodiazepines for anxiety, sedative-hypnotics for sleep, and medications for substance use disorders. These are not benign medications. They carry risks of dependence, diversion, withdrawal, overdose, cognitive impairment, falls, respiratory depression, drug interactions, and misuse.

This is especially concerning when these medications may be prescribed to children, adolescents, pregnant patients, older adults, patients with substance use disorders, patients with severe mental illness, individuals with intellectual and developmental disabilities, and medically complex patients.

Notably, the published curriculum does not identify required comprehensive physical examination training or required clinical rotations in general medicine, pediatrics, obstetrics, emergency medicine, or neurology.

Psychiatric prescribing requires far more than matching symptoms to medications. Anxiety may be caused by hyperthyroidism, arrhythmia, stimulant use, trauma, or withdrawal. Psychosis may be caused by underlining autoimmune disease, seizure disorder, delirium, infection, intoxication, medication side effects, or a primary psychiatric illness. Inattention may be ADHD, sleep deprivation, trauma, absence seizures, depression, anxiety, substance use, or family stress. Agitation may be mania, akathisia, pain, delirium, intoxication, withdrawal, or medical instability, and this is why general medical training matters.

At a minimum, any new prescriber role should be required to complete the full curriculum expected of physician assistants, including rigorous general medical education, supervised clinical rotations across medical specialties, and PA board examinations. Psychiatric prescribing cannot be safely separated from the rest of medicine.

Before this rule moves forward, we urge the Board to require stronger safeguards, including:

- Required prerequisite medical science coursework
- A full PA-equivalent medical curriculum
- Comprehensive clinical skills and physical examination training
- Required supervised clinical rotations in general medicine and relevant specialties
- Required competency-based assessments throughout training
- Successful completion of PA board examinations or an equally rigorous independent national board examination
- Specific training for children, older adults, pregnant and postpartum patients, and medically complex patients
- Clear limits and safeguards around controlled substance prescribing
- Strong supervision, referral, and quality review requirements
- Requiring ongoing chart review with collaborating physician

Thank you again for the opportunity to comment.

Sincerely,

Mary E. LaPlante, MD

President, Academy of Medicine of Cleveland & Northern Ohio (AMCNO)