

**New York Chapter of American College of Physicians  
Medical Society of the State of New York  
New York State Society of Anesthesiologists  
New York State Psychiatric Association  
New York State Academy of Family Physicians  
NYS American Academy of Pediatrics – Chapters 1, 2 and 3  
New York State Ophthalmological Society  
New York State Society of Orthopaedic Surgeons Inc.  
New York Chapter American College of Surgeons Inc.  
New York State Society of Plastic Surgeons Inc.**

**To: New York State Legislators**  
**Re: Governor's Proposed Budget 2018-2019**

Our respective organizations, which together represent tens of thousands of physicians across the State of New York, collectively urge you to reject **Section 280-c: Comprehensive Medical Management (CMM)** in the Governor's proposed 2018-2019 New York State Budget. The CMM Protocol would allow pharmacists to enter into a collaborative agreement with physicians and nurse practitioners to care for patients with chronic medical conditions. However, it fails to address important aspects of the collaboration agreement and does not clearly delineate professional responsibilities.

Demonstrations and some studies have shown that collaborative drug therapy management between physicians and pharmacists can be beneficial within defined delivery models and under certain controlled circumstances, such as management of hypertension, diabetes, or anticoagulation. In this regard, we support extending the current Collaborative Drug Therapy program, which is limited to Article 28 settings, where physicians and pharmacists will likely be on the same Electronic Medical Record (EMR). Our concern is that this CMM proposal in the State Budget goes significantly beyond the existing program by broadening pharmacists' and nurse practitioners scope of practice without adequately detailing practice limitations or defining responsibilities for the parties involved.

In this proposal, qualified pharmacists are given the authority to order blood tests and check vital signs, but there are no specifications as to who is responsible for contacting patients to address potential abnormal results. Patients may be lost to follow-up, leading to poor health outcomes. Communication between collaborators is further hindered due to the lack of a required electronic health record system. Without shared patient records and real-time notifications of medication changes between providers, pharmacists and primary care providers may unknowingly work with inaccurate or outdated health information when treating their patients. The absence of specified communication requirements and provider responsibilities increases the risk for medical errors and can negatively impact both the patient-physician relationship and the inter-disciplinary collaborative effort.

In addition, under the proposal, pharmacists would be authorized to adjust drug strength, the frequency, route of administration, and even substitution of a different drug pursuant to written

protocol. Scientific data clearly demonstrates that medications for many physical and mental health conditions are not interchangeable and adjusting the drug strength and frequency can impact the therapeutic effect.

Patient safety and well-being is always our primary concern, and we see many areas in this proposal where further definition and strengthening of the legislation would ensure that patients throughout the State receive high-quality care. By opposing **Section 280-c: Comprehensive Medical Management (CMM)** of the proposed budget, the Legislature has an opportunity to help protect the citizens of the State of New York and ensure that the health of our patients is best served. We urge the Legislature to reject this portion of the Governor's proposed budget.