

Clinical Roles

Adopted: 4-27-2026

Important Note:

A single qualified individual should be allowed to fulfill multiple roles where scope, training, and credentialing allow.

Clinician (Psilocybin Certified Clinician)

- **Definition:** as defined in NMAC 7.35.2.7. Should be a licensed clinician acting within their scope of practice who has diagnostic authority (e.g. PMHNP, LPCC, LCSW, MD, DO)
- **Responsibilities:**
 - Identify potential candidates based on qualifying conditions
 - Certify qualifying condition for entry into the program
 - Share relevant diagnostic and clinical history with patient consent and in accordance with applicable privacy laws
- **Limitations**
 - Certification does not constitute clinical clearance
 - Not responsible for determining medical appropriateness, dosing, safety planning, or administration decisions
- **Recommendation to Education & Training:**
 - Establish minimum education, continuing education, and licensure requirements
 - Define required competencies

Practitioner (Psychedelic Therapist)

- **Definition:** as defined in NMAC 7.35.2.7.
- **Scope:**
 - Conduct comprehensive biopsychosocial assessment
 - Review medical, psychiatric, and substance use history
 - Identify contraindications and medication interactions

- Evaluate risk for adverse psychological or physiological response, create a safety plan, and assess support system
- Determine medical appropriateness for psilocybin treatment
- **Responsibilities:**
 - Evaluate clinical appropriateness for psilocybin use (including but not limited to medication interactions, medical & mental health history, and current functioning); if the patient is not appropriate, refer them to a primary care provider or other appropriate treatment avenue
 - Use trauma informed and culturally competent communication throughout the screening and treatment process.
 - Assign a Clinical Support Tier
 - Establish dosing parameters or considerations
 - Approve or defer participation based on safety
 - Must be involved in psychological preparation
- **Limitations:**
 - Does not provide facilitation unless separately credentialed
 - Does not conduct preparation/integration unless dual trained
- **Recommendation to Education & Training:**
 - Establish minimum education and licensure requirements
 - Define required competencies in assessment, contraindication review, interventions, medication interaction screening, risk stratification, and harm reduction.

Facilitator

- **Definition:** means an individual who has completed Department-approved training and education and has been registered with the Department, and whose role is limited to providing non-clinical support and presence to a patient preparing for, experiencing the effects of, or integrating the effects of Administration, as allowed by the Program. A facilitator does not perform, and shall not be construed to perform, clinical assessment, diagnosis, treatment, or any other act constituting the practice of medicine, nursing, or any other licensed health profession. A Facilitator does not act under the supervision, direction, or authority of any licensed health care provider, and no provider shall be deemed to have supervisory responsibility over a Facilitator solely by virtue of their concurrent participation in any part of the Program.

- **Responsibilities:**
 - Conduct administrative preparation and integration sessions in coordination with Psychedelic Therapist
 - Obtain informed consent
 - Support patient during administration session
 - Monitor psychological and physical safety during sessions
 - Escalate medical or psychological concerns to the Psychedelic Therapist or appropriate emergency services
 - Prepare materials for patient self-administration in accordance with approved protocols and Psychedelic Therapist's direction
 - Document sessions activities
- **Limitations**
 - Does not determine medical appropriateness independently
 - Does not override contraindications or safety restrictions
- **Recommendation to Education & Training:**
 - Establish minimum education, continuing education, and licensure requirements
 - Define required competencies.