

From: [Maya Albert](#)
To: [Clark, Jacob, DOH](#)
Subject: [EXTERNAL] Public Comment on Proposed Rule 7.35.3 NMAC - The Synthesis Institute
Date: Friday, September 25, 2026 7:20:04 PM

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Dear Mr. Clark,

Thank you to the Department and to the Medical Psilocybin Advisory Board for the considerable work reflected in the revised proposed rule published August 25, and for the openness to community input that has characterized this process from the start. I am writing as CEO of The Synthesis Institute, a psychedelic practitioner training organization whose Psychedelic Practitioner Certificate Training includes a track for Colorado's regulated program and has trained more than 600 alumni, and I would like to offer comments on two provisions that bear directly on whether New Mexico can build a qualified workforce at the pace the program requires.

1. The in-person didactic requirement

As I read the revised text, the practitioner and facilitator therapy module requires 65 didactic hours, at least one third of which must be delivered in person. Our experience within Colorado's regulated program is that the knowledge-based portion of this training (pharmacology, contraindications, ethics, scope of practice, the legal framework) transfers well to live, synchronous virtual instruction, and that the embodied competencies the Department is rightly concerned with are built in supervised practice with real clients, which the rule already requires at 100 and 120 practicum hours.

We would respectfully ask the Department to consider allowing the didactic module to be delivered fully through live virtual instruction, or alternatively to allow in-person practicum hours to satisfy the in-person component, so that the requirement sits where it does the most good. Given New Mexico's largely rural population and the provider shortage the program is meant to address, we believe an in-person didactic requirement may fall hardest on exactly the clinicians the program most needs to reach, many of whom would need to travel to Albuquerque or Santa Fe, sometimes repeatedly, to complete it.

2. Reciprocity for supervised practicum

The rule provides a reduced practicum through two waiver provisions, which we appreciate as a recognition that supervised experience gained under another state's oversight carries real value. The two provisions appear to conflict: §7.35.3.10(D)(1) requires 40 hours of contact time with two individual sessions and two group sessions for applicants trained through programs in other jurisdictions, while §7.35.3.19(H) requires 40 hours with two individual sessions and one group session for applicants who graduate from an approved program, and an out-of-state applicant could reasonably qualify under either. We would ask the Department to resolve the discrepancy by accepting any practicum completed through an approved or state-regulated program toward the 40 hours, without specifying a number of individual or group sessions, as group formats are one valid modality among several and a fixed session count may create scheduling and cost barriers without a corresponding gain in safety.

We would also ask that this recognition continue beyond December 31, 2027, so that practicum hours completed and documented within another state's regulated program can count toward the New Mexico practicum on an ongoing basis, in the spirit of the waiver authority the Department has already reserved under §7.35.3.10(D)(2) and §7.35.3.19(G) for the program's initial period.

Thank you for the care the Department has brought to this rulemaking, and please let me know if it would be helpful for me or our program team to share further detail on how practicum and didactic training are structured in our Colorado program.

Best,
Maya Albert

Maya Albert
CEO
[The Synthesis Institute](#)