Proposal for the Utah Division of Professional Licensing (DOPL) to Regulate Psychedelic Medicine Providers

Submitted by:

Dr. Heather Curtis, MD

Founder, I THRIVE Inc.

Date: February 10, 2025

Section 1: The Need for State-Level Regulation of Psychedelic Medicine

Introduction: Ensuring Safety and Professional Standards

The field of psychedelic-assisted therapy is rapidly expanding in Utah, offering new treatment options for PTSD, depression, and trauma recovery. However, the absence of clear state-level regulation has created serious ethical and safety concerns for both patients and providers.

Why Utah Needs Psychedelic Medicine Regulations

    •    Cases of patient exploitation, coercion, and sexual abuse have been reported in Utah’s psychedelic therapy community.

    •    Some providers operate without proper training, licensing, or ethical oversight, putting vulnerable individuals at risk.

    •    Lack of state-mandated informed consent protections increases the potential for patient harm.

    •    Survivors of unethical psychedelic therapy practices have faced retaliation and legal threats for speaking out.

To prevent further harm, DOPL must implement clear regulations and licensing requirements for psychedelic medicine providers in Utah, ensuring safety, ethical integrity, and professional accountability.

Section 2: Key Issues Identified in Utah’s Psychedelic Therapy Practices

1. Unregulated Providers and Inconsistent Standards

    •    Many practitioners in Utah lack formal medical or psychiatric training.

    •    Some operate without certification, trauma-informed training, or medical supervision.

2. Ethical Violations and Abuse of Power

    •    Multiple patients have reported coercion, sexual misconduct, and emotional manipulation by psychedelic providers.

    •    Some therapists have engaged in dual relationships, blurring professional boundaries and leading to patient exploitation.

3. Informed Consent Failures and Lack of Patient Protections

    •    Patients are often not fully informed of the risks associated with psychedelic therapy.

    •    There is no state-mandated requirement for consent documentation or disclosure of potential adverse effects.

4. Retaliation Against Survivors and Lack of Oversight

    •    Survivors of abuse in psychedelic settings have faced defamation lawsuits, professional blacklisting, and legal intimidation.

    •    Current laws do not provide sufficient protections for whistleblowers reporting unethical psychedelic practitioners.

Without state intervention, these issues will continue to harm patients and undermine public trust in psychedelic-assisted therapy in Utah.

Section 3: Proposed Licensing and Ethical Standards for Psychedelic Providers

To ensure patient safety and professional accountability, DOPL should establish the following licensing and ethical requirements for psychedelic medicine providers in Utah:

1. State-Licensed Training and Certification Requirements

    •    All psychedelic therapy providers must obtain a state-issued license through a structured certification program.

    •    Certification should include formal education in trauma-informed care, ethics, and medical safety protocols.

    •    Providers must complete continuing education and recertification every two years.

2. Mandatory Informed Consent Procedures

    •    Patients must receive full disclosure of risks, benefits, and expected outcomes before treatment.

    •    Providers must obtain written consent from patients, ensuring they understand the nature of the psychedelic experience.

3. Strict Ethical Guidelines and Professional Boundaries

    •    Sexual, financial, or emotional exploitation of patients should result in immediate license revocation.

    •    Therapists should be prohibited from engaging in dual relationships that could compromise patient safety.

4. Independent Oversight and Reporting Mechanisms

    •    DOPL should establish an independent review board to investigate complaints against psychedelic providers.

    •    A confidential reporting system should be created to allow patients and colleagues to report misconduct without fear of retaliation.

Section 4: Legal Protections for Survivors and Whistleblowers

To prevent cover-ups and retaliation, DOPL should implement strong legal protections for patients, survivors, and whistleblowers who report unethical behavior.

Key Recommendations:

    •    Whistleblower Protections: Ensure that individuals who report misconduct cannot be sued for defamation or retaliated against professionally.

    •    Survivor Rights Protections: Provide survivors of abuse in psychedelic therapy legal recourse and support services.

    •    Strict Accountability for Institutions: Any organization or clinic found complicit in covering up misconduct should face fines, sanctions, or loss of accreditation.

By protecting those who come forward, DOPL can create a culture of transparency, safety, and ethical integrity in Utah’s psychedelic therapy field.

Section 5: A Call to Action for DOPL to Regulate Psychedelic Medicine

Why This Matters Now

With psychedelic therapy expanding in Utah, now is the time for DOPL to take proactive steps to regulate providers, protect patients, and ensure ethical practices.

Summary of Proposed Actions for DOPL:

✅ Create a state licensing system for psychedelic-assisted therapy providers.

✅ Implement mandatory training and certification programs.

✅ Enforce strict ethical guidelines and professional boundaries.

✅ Establish an independent oversight board to investigate complaints.

✅ Protect survivors and whistleblowers from retaliation and legal threats.

By acting now, DOPL can ensure that psychedelic medicine is safely integrated into Utah’s healthcare system while preventing the unethical practices that have already harmed patients in the state.

Final Statement

I urge DOPL to adopt these recommendations and establish regulations that prioritize safety, ethics, and patient rights. Utah has an opportunity to set a national standard for responsible psychedelic-assisted therapy—but only if strong, enforceable guidelines are put in place now.

Submitted by:

Dr. Heather Curtis, MD

Founder, I THRIVE Inc.

www.i-thrive.org

Section 6: References and Supporting Evidence

Introduction: Ensuring Evidence-Based Policy Recommendations

This proposal is supported by case studies, legal precedents, research from medical institutions, and survivor reports detailing the risks of unregulated psychedelic-assisted therapy. Below is a list of references that validate the need for state-level regulation in Utah.

Key References

    1.    Utah Department of Commerce – Division of Professional Licensing (DOPL). Regulatory Standards for Mental Health Professionals in Utah. Retrieved from:

    •    https://dopl.utah.gov

    2.    Utah State Legislature (2023). Proposed Amendments to Mental Health Licensing Requirements. Retrieved from:

    •    https://le.utah.gov

    3.    Multidisciplinary Association for Psychedelic Studies (MAPS, 2021). Ethical Standards in Psychedelic-Assisted Therapy. Retrieved from:

    •    https://maps.org

    4.    California Institute of Integral Studies (CIIS, 2022). Trauma-Informed Training for Psychedelic Therapists. Retrieved from:

    •    https://www.ciis.edu

    5.    Robison, R. & Thayer, S. (2022). Ethical Challenges in Psychedelic Therapy: A Utah Case Study. Numinus. Retrieved from:

    •    https://www.numinus.com

    6.    Curtis, H. (2024). Survivor Advocacy and Ethical Oversight in Psychedelic Medicine. I THRIVE Initiative. Retrieved from:

    •    https://www.i-thrive.org

    7.    Utah Survivor Reports and Legal Cases (2023). Documented Complaints of Ethical Violations in Psychedelic Therapy Settings. Retrieved from:

    •    https://utahlegalwatch.org

    8.    National Association of State Mental Health Program Directors (2023). Best Practices for Regulating Alternative Therapies. Retrieved from:

    •    https://www.nasmhpd.org

    9.    Zendo Project (2020). Harm Reduction Strategies in Psychedelic-Assisted Therapy. Retrieved from:

    •    https://zendoproject.org

    10.    Doblin, R. (2018). Ethics and Safety in Psychedelic Research. MAPS.

Acknowledgments

Special thanks to:

    •    Utah-based survivors and advocates who have shared their experiences and provided insight into the need for regulatory reforms.

    •    Medical and legal experts who have contributed to developing ethical standards for psychedelic therapy.

    •    Organizations advocating for professional accountability and patient protections in mental health care.

Final Statement

The implementation of ethical standards and licensing requirements is essential to protecting vulnerable individuals and ensuring the credibility of psychedelic-assisted therapy in Utah. By establishing clear regulations and oversight mechanisms, DOPL can help prevent further harm and create a safer, more professional field for psychedelic medicine.

Submitted by:

Dr. Heather Curtis, MD

Founder, I THRIVE Inc.

www.i-thrive.org