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Christopher Zinke
Principal Deputies

State Capitol, Suite 3021
Sacramento, CA 95814-4906
(916) 445-3057
Telecopier: (916) 322-0769

Legislative Counsel of California

BION M. GREGORY

Sacramento, California
November 14, 1995

Gerald Rose Adams
Martin L. Anderson
Paul Amila
Hema Rao Anwar
Charles C. Asbill
Joe J. Ayala
Renee P. Beliso
Lara K. Bierman
Diane F. Boyer-Vine
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Honorable Valerie K. Brown
3013 State Capitol

Psychiatric Technicians: Scope of Practice - #33064

Dear Ms. Brown:

You have asked three questions, separately considered below, involving the extent to which psychiatric technicians may be limited in the performance of the services for which they are licensed by the type of facility in which they may work or by the types of patients with whom they may work.

QUESTION NO. 1

May a psychiatric technician perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code in any type of facility with respect to persons who are mentally ill, emotionally disturbed, or developmentally disabled?

OPINION NO. 1

A psychiatric technician may perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code in any type of facility with respect to persons who are mentally ill, emotionally disturbed, or developmentally disabled.

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ANALYSIS NO. 1

Section 4502 of the Business and Professions Code¹ reads as follows:

"4502. As used in this chapter, 'psychiatric technician' means any person who, for compensation or personal profit, implements procedures and techniques which involve understanding of cause and effect and which are used in the care, treatment, and rehabilitation of mentally ill, emotionally disturbed, or mentally retarded persons and who has one or more of the following:

"(a) Direct responsibility for administering or implementing specific therapeutic procedures, techniques, treatments, or medications with the aim of enabling recipients or patients to make optimal use of their therapeutic regime, their social and personal resources, and their residential care.

"(b) Direct responsibility for the application of interpersonal and technical skills in the observation and recognition of symptoms and reactions of recipients or patients, for the accurate recording of such symptoms and reactions, and for the carrying out of treatments and medications as prescribed by a licensed physician and surgeon or a psychiatrist.

"The psychiatric technician in the performance of such procedures and techniques is responsible to the director of the service in which his duties are performed. The director may be a licensed physician and surgeon, psychiatrist, psychologist, rehabilitation therapist, social worker, registered nurse, or other professional personnel.

¹ Hereafter, all section references are to the Business and Professions Code, unless otherwise indicated.

² Section 4502 refers, among others, to mentally retarded persons while the questions presented refer to persons who are developmentally disabled. The term "developmentally disabled" includes mental retardation and for purposes of this request we use the terms synonymously (see Sec. 2728.5 and see Sec. 4512, W. & I.C.).

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"Nothing herein shall authorize a licensed psychiatric technician to practice medicine or surgery or to undertake the prevention, treatment or cure of disease, pain, injury, deformity, or mental or physical condition in violation of the law." (Emphasis added.)

It is a basic rule of statutory construction that "[t]o ascertain the meaning of a statute, we begin with the language in which it is framed (People v. Overstreet, 42 Cal. 3d 891, 895; Leroy T. v. Workmen's Comp. Appeals Bd., 12 Cal. 3d 434, 438). In this regard, there is nothing in the language of Section 4502 or otherwise contained in the Psychiatric Technicians Law (Ch. 10 (commencing with Sec. 4500), Div. 2) that expressly limits psychiatric technicians in the performance of their services to certain health facilities.

While the language in the first sentence of the second paragraph of subdivision (b) of Section 4502, stating that the psychiatric technician is "responsible to the director of the service in which his duties are performed" might imply that the psychiatric technician will be limited to working in an institutional setting, this result would be inconsistent with another well settled axiom of construction that a court is not authorized in the construction of a statute to create exceptions or limitations not specifically made by the Legislature (Stockton Theatres, Inc. v. Palermo, 47 Cal. 2d 469, 476). Moreover, while the term "service" is not defined for purposes of this sentence, we do not think "service" in this context refers to a particular institution or health facility. Instead, since psychiatric technicians work in a variety of medical specialties (with mentally ill, emotionally disturbed, and mentally retarded patients (Sec. 4502)) we think "service" in this context refers to the specific class or type of patients with which the technician works (see "service" definitions 2, 9a, 14a, and 18, Webster's Third New International Dictionary, p. 2075). This is supported by the fact that "director" for purposes of this sentence includes health professionals from a range of medical disciplines whose oversight of a particular psychiatric technician would likely depend upon the types of patients to which care is provided.

Finally, it is a further principle of statutory construction that a statute is to be given a reasonable and commonsense construction in accordance with the apparent purpose and intention of the lawmaker (County of Alameda v. Kuchel, 32 Cal. 2d 193, 199). In order to discern this intention, both the legislative history of a statute and the wider historical circumstances of its enactment may be considered in ascertaining legislative intent (Dyna-Med, Inc. v. Fair Employment and Housing Com., 43 Cal. 3d 1379, 1388).

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In this case, in 1959, a Senate Subcommittee on Psychiatric Technicians conducted extensive hearings on whether to grant professional status by means of certification to psychiatric technicians. Consequently, the Psychiatric Technicians Law was initially enacted as a certification law in 1959 (see Ch. 1851, Stats. 1959). Throughout the report of this Senate subcommittee, the statements made by those in support of the proposed certification of psychiatric technicians clearly indicate that the intent of the certification law was to establish minimum standards for psychiatric technicians employed in both public and private health facilities as well as technicians operating independently of a particular institution (see Report of the Subcommittee on Psychiatric Technicians (1959) Appendix to Sen. J. (1959 Regular Session) hereafter "Subcommittee Report"). Thus, the Subcommittee Report supports the conclusion that the practice of psychiatric technicians is not limited to particular institutional settings. In this connection, some of the statements included in the Subcommittee Report provided as follows:

"This, then, is the goal of the California Society of Psychiatric Technicians and should be the goal of all persons connected with the matter. The society wants to see the standards of mental care raised and maintained in all hospitals, public and private, to see the field of psychiatric technology standardized in order that a permanent, highly trained group of specialists can be developed for the good of the patients, then families, and the State of California as a whole.

* * *

"... [T]here is an unknown but considerable number of psychiatric technicians employed in general hospitals, county and private, working on psychiatric wards and psychiatric facilities.

* * *

"... [The standards for psychiatric technicians] also should apply to those people who operate independently of any hospital or any institution. There are unquestionably a number of people who are taking care of private cases mentally, emotionally ill and handicapped, who are not connected in any way with any institution, public or private, and who in no way come under the jurisdiction of the Department of Mental Hygiene or the Department of Public Health or any other state

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agency and I think they also should be included when the bill is finally drafted." (Subcommittee Report, pp. 21, 23, and 27.)

Accordingly, we conclude that a psychiatric technician may perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code in any type of facility or noninstitutional setting with respect to persons who are mentally ill, emotionally disturbed, or developmentally disabled.

QUESTION NO. 2

May a psychiatric technician who is employed by a facility that has, as residents, persons who are mentally ill, emotionally disturbed, or developmentally disabled, and other residents who are not, perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code with respect to those persons who are not mentally ill, emotionally disturbed, or developmentally disabled?

OPINION NO. 2

A psychiatric technician who is employed by a facility that has, as residents, persons who are mentally ill, emotionally disturbed, or developmentally disabled, and other residents who are not, may perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code as well as other nursing services described in Section 2728 of the Business and Professions Code with respect to those persons who are not mentally ill, emotionally disturbed, or developmentally disabled, if adequate medical and nursing supervision is provided.

ANALYSIS NO. 2

An argument might be made based on the first paragraph of Section 4502 that psychiatric technicians may only perform procedures and techniques on patients that are "mentally ill, emotionally disturbed, or mentally retarded." In this regard Section 4502 provides, in pertinent part, as follows:

"... 'psychiatric technician' means any person who ... implements procedures and techniques ... which are used in the care, treatment, and rehabilitation of mentally ill, emotionally disturbed, or mentally retarded persons

* * * (See also Opinion of the Department of Consumer Affairs, Legal Op. No. 77-7 (1/28/77).)

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California, for examination. They have to do blood pressures and then the ordinary nursing care, learn to weigh and measure the food, the intake and output and so forth of the patient." (Subcommittee Report, pp. 19, 34, 39, and 42.)

Finally, Section 4511, which sets forth the requirements for a psychiatric technician's license, requires that the applicant have successfully completed a course of study that incorporates "nursing knowledge and skills necessary for the care of any ill person." Therefore, because a psychiatric technician is required to be trained to care for any ill person it is consistent to conclude that psychiatric technicians are authorized to care for patients other than the mentally ill, emotionally disturbed, or mentally retarded.

Thus, while Sections 2728 and 2728.5 may state that psychiatric technicians are limited to the performance of services included within their license, we think based on our construction of Section 4502 that the scope of licensure includes the care and treatment of patients who may not be "mentally ill, emotionally disturbed, or mentally retarded" and that Sections 2728 and 2728.5 are not a limitation on this authority but additionally authorize psychiatric technicians to perform nursing services on patients so long as adequate supervision is provided. It should be noted however that nursing services described in Section 2728 may only be performed in facilities within the jurisdiction of, or subject to visitation by, the various agencies listed in Sections 2728 and 2728.5.

Accordingly, we conclude that a psychiatric technician who is employed by a facility that has, as residents, persons who are mentally ill, emotionally disturbed, or developmentally disabled, and other residents who are not, may perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code as well as other nursing services described in Section 2728 of the Business and Professions Code with respect to those persons who are not mentally ill,

⁷ In addition, in a legal opinion of the Department of Consumer Affairs, of which the Board of Registered Nursing, and the Board of Vocational Nurse and Psychiatric Technician Examiners of the State of California is a part, the department opined that "[i]f adequate medical and nursing supervision, as determined by the Director of the Department of Health, are provided, psychiatric technicians may administer medications to patients who are not mentally ill, emotionally disturbed or mentally retarded ..." (see Department of Consumer Affairs Legal Op. No. 77-7 (1/28/77)).

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emotionally disturbed, or developmentally disabled if adequate medical and nursing supervision is provided.

QUESTION NO. 3

May a psychiatric technician be employed by any public or private facility to perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code with respect to patients who are not mentally ill, emotionally disturbed, or developmentally disabled if adequate medical and nursing supervision is provided?

OPINION NO. 3

A psychiatric technician may be employed by any public or private facility to perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code as well as other nursing services described in Section 2728 of the Business and Professions Code with respect to patients who are not mentally ill, emotionally disturbed, or developmentally disabled if adequate medical and nursing supervision is provided.

ANALYSIS NO. 3

Initially we note that a public facility would employ psychiatric technicians only if it had statutory or other authority to do so. With this in mind, we concluded in Opinion No. 2, that if adequate medical and nursing supervision is provided, a psychiatric technician may be employed by a facility with residents who are mentally ill, emotionally disturbed, or developmentally disabled, and other residents who are not, to perform nursing services in addition to the services prescribed in subdivisions (a) and (b) of Section 4502 for the residents who are not mentally ill, emotionally disturbed, or developmentally disabled.

Nonetheless, it is apparent from Sections 4502 and 4511 that psychiatric technicians are trained for and are responsible for implementing special skills, procedures, and techniques used in the care and treatment of "mentally ill, emotionally disturbed, or mentally retarded persons." Thus, a facility that does not have patients that require the implementation of any of the procedures or techniques for which psychiatric technicians are specifically trained would not necessarily benefit from the employment of a psychiatric technician.

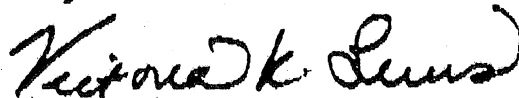
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Moreover, as discussed in Analysis No. 2, while psychiatric technicians are authorized to perform nursing services in certain facilities by Sections 2728 and 2728.5, "adequate medical and nursing supervision by a professional nurse or nurses" is required to be provided (Sec. 2728). Whether adequate supervision is available in a particular public or private facility is to be determined by the appropriate state department under whose jurisdiction the facility falls (Sec. 2728). Therefore, if the State Department of Health Services determines for example that in a particular facility desiring to employ psychiatric technicians to perform nursing services, adequate medical and nursing supervision is not available, psychiatric technicians would be prohibited from performing nursing services in that facility.

Accordingly, we conclude that a psychiatric technician may be employed by any public or private facility to perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code as well as other nursing services described in Section 2728 of the Business and Professions Code with respect to patients who are not mentally ill, emotionally disturbed, or developmentally disabled if adequate medical and nursing supervision is provided.

Very truly yours,

Bion M. Gregory
Legislative Counsel



By
Victoria K. Lewis
Deputy Legislative Counsel

VKL:lb

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Telecopier: (916) 322-0769

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Honorable Valerie K. Brown
3013 State Capitol

Psychiatric Technicians: Scope of Practice - #33064

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QUESTION NO. 1

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OPINION NO. 1

A psychiatric technician may perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code in any type of facility with respect to persons who are mentally ill, emotionally disturbed, or developmentally disabled.

Honorable Valerie K. Brown - p. 2 - #33064

ANALYSIS NO. 1

Section 4502 of the Business and Professions Code¹ reads as follows:

"4502. As used in this chapter, 'psychiatric technician' means any person who, for compensation or personal profit, implements procedures and techniques which involve understanding of cause and effect and which are used in the care, treatment, and rehabilitation of mentally ill, emotionally disturbed, or mentally retarded persons and who has one or more of the following:

"(a) Direct responsibility for administering or implementing specific therapeutic procedures, techniques, treatments, or medications with the aim of enabling recipients or patients to make optimal use of their therapeutic regime, their social and personal resources, and their residential care.

"(b) Direct responsibility for the application of interpersonal and technical skills in the observation and recognition of symptoms and reactions of recipients or patients, for the accurate recording of such symptoms and reactions, and for the carrying out of treatments and medications as prescribed by a licensed physician and surgeon or a psychiatrist.

"The psychiatric technician in the performance of such procedures and techniques is responsible to the director of the service in which his duties are performed. The director may be a licensed physician and surgeon, psychiatrist, psychologist, rehabilitation therapist, social worker, registered nurse, or other professional personnel.

¹ Hereafter, all section references are to the Business and Professions Code, unless otherwise indicated.

² Section 4502 refers, among others, to mentally retarded persons while the questions presented refer to persons who are developmentally disabled. The term "developmentally disabled" includes mental retardation and for purposes of this request we use the terms synonymously (see Sec. 2728.5 and see Sec. 4512, W. & I.C.).

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"Nothing herein shall authorize a licensed psychiatric technician to practice medicine or surgery or to undertake the prevention, treatment or cure of disease, pain, injury, deformity, or mental or physical condition in violation of the law." (Emphasis added.)

It is a basic rule of statutory construction that "[t]o ascertain the meaning of a statute, we begin with the language in which it is framed (People v. Overstreet, 42 Cal. 3d 891, 895; Leroy T. v. Workmen's Comp. Appeals Bd., 12 Cal. 3d 434, 438). In this regard, there is nothing in the language of Section 4502 or otherwise contained in the Psychiatric Technicians Law (Ch. 10 (commencing with Sec. 4500), Div. 2) that expressly limits psychiatric technicians in the performance of their services to certain health facilities.

While the language in the first sentence of the second paragraph of subdivision (b) of Section 4502, stating that the psychiatric technician is "responsible to the director of the service in which his duties are performed" might imply that the psychiatric technician will be limited to working in an institutional setting, this result would be inconsistent with another well settled axiom of construction that a court is not authorized in the construction of a statute to create exceptions or limitations not specifically made by the Legislature (Stockton Theatres, Inc. v. Palermo, 47 Cal. 2d 469, 476). Moreover, while the term "service" is not defined for purposes of this sentence, we do not think "service" in this context refers to a particular institution or health facility. Instead, since psychiatric technicians work in a variety of medical specialties (with mentally ill, emotionally disturbed, and mentally retarded patients (Sec. 4502)) we think "service" in this context refers to the specific class or type of patients with which the technician works (see "service" definitions 2, 9a, 14a, and 18, Webster's Third New International Dictionary, p. 2075). This is supported by the fact that "director" for purposes of this sentence includes health professionals from a range of medical disciplines whose oversight of a particular psychiatric technician would likely depend upon the types of patients to which care is provided.

Finally, it is a further principle of statutory construction that a statute is to be given a reasonable and commonsense construction in accordance with the apparent purpose and intention of the lawmaker (County of Alameda v. Kuchel, 32 Cal. 2d 193, 199). In order to discern this intention, both the legislative history of a statute and the wider historical circumstances of its enactment may be considered in ascertaining legislative intent (Dyna-Med, Inc. v. Fair Employment and Housing Com., 43 Cal. 3d 1379, 1388).

Honorable Valerie K. Brown - p. 4 - #33064

In this case, in 1959, a Senate Subcommittee on Psychiatric Technicians conducted extensive hearings on whether to grant professional status by means of certification to psychiatric technicians. Consequently, the Psychiatric Technicians Law was initially enacted as a certification law in 1959 (see Ch. 1851, Stats. 1959). Throughout the report of this Senate subcommittee, the statements made by those in support of the proposed certification of psychiatric technicians clearly indicate that the intent of the certification law was to establish minimum standards for psychiatric technicians employed in both public and private health facilities as well as technicians operating independently of a particular institution (see Report of the Subcommittee on Psychiatric Technicians (1959) Appendix to Sen. J. (1959 Regular Session) hereafter "Subcommittee Report"). Thus, the Subcommittee Report supports the conclusion that the practice of psychiatric technicians is not limited to particular institutional settings. In this connection, some of the statements included in the Subcommittee Report provided as follows:

"This, then, is the goal of the California Society of Psychiatric Technicians and should be the goal of all persons connected with the matter. The society wants to see the standards of mental care raised and maintained in all hospitals, public and private, to see the field of psychiatric technology standardized in order that a permanent, highly trained group of specialists can be developed for the good of the patients, then families, and the State of California as a whole.

* * *

"... [T]here is an unknown but considerable number of psychiatric technicians employed in general hospitals, county and private, working on psychiatric wards and psychiatric facilities.

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"... [The standards for psychiatric technicians] also should apply to those people who operate independently of any hospital or any institution. There are unquestionably a number of people who are taking care of private cases mentally, emotionally ill and handicapped, who are not connected in any way with any institution, public or private, and who in no way come under the jurisdiction of the Department of Mental Hygiene or the Department of Public Health or any other state

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agency and I think they also should be included when the bill is finally drafted." (Subcommittee Report, pp. 21, 23, and 27.)

Accordingly, we conclude that a psychiatric technician may perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code in any type of facility or noninstitutional setting with respect to persons who are mentally ill, emotionally disturbed, or developmentally disabled.

QUESTION NO. 2

May a psychiatric technician who is employed by a facility that has, as residents, persons who are mentally ill, emotionally disturbed, or developmentally disabled, and other residents who are not, perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code with respect to those persons who are not mentally ill, emotionally disturbed, or developmentally disabled?

OPINION NO. 2

A psychiatric technician who is employed by a facility that has, as residents, persons who are mentally ill, emotionally disturbed, or developmentally disabled, and other residents who are not, may perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code as well as other nursing services described in Section 2728 of the Business and Professions Code with respect to those persons who are not mentally ill, emotionally disturbed, or developmentally disabled, if adequate medical and nursing supervision is provided.

ANALYSIS NO. 2

An argument might be made based on the first paragraph of Section 4502 that psychiatric technicians may only perform procedures and techniques on patients that are "mentally ill, emotionally disturbed, or mentally retarded." In this regard Section 4502 provides, in pertinent part, as follows:

"... 'psychiatric technician' means any person who ... implements procedures and techniques ... which are used in the care, treatment, and rehabilitation of mentally ill, emotionally disturbed, or mentally retarded persons

* * * (See also Opinion of the Department of Consumer Affairs, Legal Op. No. 77-7 (1/28/77).)

Honorable Valerie K. Brown - p. 10 - #33064

California, for examination. They have to do blood pressures and then the ordinary nursing care, learn to weigh and measure the food, the intake and output and so forth of the patient." (Subcommittee Report, pp. 19, 34, 39, and 42.)

Finally, Section 4511, which sets forth the requirements for a psychiatric technician's license, requires that the applicant have successfully completed a course of study that incorporates "nursing knowledge and skills necessary for the care of any ill person." Therefore, because a psychiatric technician is required to be trained to care for any ill person it is consistent to conclude that psychiatric technicians are authorized to care for patients other than the mentally ill, emotionally disturbed, or mentally retarded.

Thus, while Sections 2728 and 2728.5 may state that psychiatric technicians are limited to the performance of services included within their license, we think based on our construction of Section 4502 that the scope of licensure includes the care and treatment of patients who may not be "mentally ill, emotionally disturbed, or mentally retarded" and that Sections 2728 and 2728.5 are not a limitation on this authority but additionally authorize psychiatric technicians to perform nursing services on patients so long as adequate supervision is provided. It should be noted however that nursing services described in Section 2728 may only be performed in facilities within the jurisdiction of, or subject to visitation by, the various agencies listed in Sections 2728 and 2728.5.

Accordingly, we conclude that a psychiatric technician who is employed by a facility that has, as residents, persons who are mentally ill, emotionally disturbed, or developmentally disabled, and other residents who are not, may perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code as well as other nursing services described in Section 2728 of the Business and Professions Code with respect to those persons who are not mentally ill,

⁷ In addition, in a legal opinion of the Department of Consumer Affairs, of which the Board of Registered Nursing, and the Board of Vocational Nurse and Psychiatric Technician Examiners of the State of California is a part, the department opined that "[i]f adequate medical and nursing supervision, as determined by the Director of the Department of Health, are provided, psychiatric technicians may administer medications to patients who are not mentally ill, emotionally disturbed or mentally retarded ..." (see Department of Consumer Affairs Legal Op. No. 77-7 (1/28/77)).

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emotionally disturbed, or developmentally disabled if adequate medical and nursing supervision is provided.

QUESTION NO. 3

May a psychiatric technician be employed by any public or private facility to perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code with respect to patients who are not mentally ill, emotionally disturbed, or developmentally disabled if adequate medical and nursing supervision is provided?

OPINION NO. 3

A psychiatric technician may be employed by any public or private facility to perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code as well as other nursing services described in Section 2728 of the Business and Professions Code with respect to patients who are not mentally ill, emotionally disturbed, or developmentally disabled if adequate medical and nursing supervision is provided.

ANALYSIS NO. 3

Initially we note that a public facility would employ psychiatric technicians only if it had statutory or other authority to do so. With this in mind, we concluded in Opinion No. 2, that if adequate medical and nursing supervision is provided, a psychiatric technician may be employed by a facility with residents who are mentally ill, emotionally disturbed, or developmentally disabled, and other residents who are not, to perform nursing services in addition to the services prescribed in subdivisions (a) and (b) of Section 4502 for the residents who are not mentally ill, emotionally disturbed, or developmentally disabled.

Nonetheless, it is apparent from Sections 4502 and 4511 that psychiatric technicians are trained for and are responsible for implementing special skills, procedures, and techniques used in the care and treatment of "mentally ill, emotionally disturbed, or mentally retarded persons." Thus, a facility that does not have patients that require the implementation of any of the procedures or techniques for which psychiatric technicians are specifically trained would not necessarily benefit from the employment of a psychiatric technician.

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Moreover, as discussed in Analysis No. 2, while psychiatric technicians are authorized to perform nursing services in certain facilities by Sections 2728 and 2728.5, "adequate medical and nursing supervision by a professional nurse or nurses" is required to be provided (Sec. 2728). Whether adequate supervision is available in a particular public or private facility is to be determined by the appropriate state department under whose jurisdiction the facility falls (Sec. 2728). Therefore, if the State Department of Health Services determines for example that in a particular facility desiring to employ psychiatric technicians to perform nursing services, adequate medical and nursing supervision is not available, psychiatric technicians would be prohibited from performing nursing services in that facility.

Accordingly, we conclude that a psychiatric technician may be employed by any public or private facility to perform the duties prescribed in subdivisions (a) and (b) of Section 4502 of the Business and Professions Code as well as other nursing services described in Section 2728 of the Business and Professions Code with respect to patients who are not mentally ill, emotionally disturbed, or developmentally disabled if adequate medical and nursing supervision is provided.

Very truly yours,

Bion M. Gregory
Legislative Counsel



By
Victoria K. Lewis
Deputy Legislative Counsel

VKL:lb