



Mental Fitness to Fly: Pathway to Psychiatric Certification

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Civil Aviation Medical Association Annual Meeting, Greensboro
September 15, 2017

Disclosure Information

- Financial: Prior consulting for JetBlue (2013)
- No off-label med use and/or investigational

Agenda

- Introduction
 - How did we get here?? (& f/u to BasicMed question)
- Regulatory policies on mental health
 - Depression is not specifically DQ'ing? Huh?
- Key components of mental status exam
- What is issuable & what is not
 - Simplifying & demystifying the SSRI puzzle
- Conclusion

Objectives

- Understand the conceptualization of mental health from aviation regulatory definitions
- Review the psychiatric portion of the flight physical
- Understand the SSRI Decision Paths

Follow-up to BasicMed question

- Can a person obtain BasicMed with a DUI?
- Technically, yes, here's why, but... what are the BasicMed Guidelines??



U.S. Department
of Transportation
Federal Aviation
Administration

Advisory Circular

Subject: Alternative Pilot Physical
Examination and Education
Requirements

Date: 1/9/17

Initiated by: AFS-800

AC No: 68-1

Change:

CHAPTER 8. SPECIAL BASICMED REQUIREMENTS FOR CERTAIN MEDICAL CONDITIONS

- 8.1 **General.** BasicMed contains several provisions that require specific actions for individuals who have mental, cardiac, or neurological health conditions.
- 8.2 **Special Issuance Medical Certificates Required.** For certain conditions, a person wishing to exercise BasicMed must complete the process for obtaining an Authorization for special issuance of a medical certificate in accordance with § 68.9. The person is required to obtain only one special issuance medical certificate for each condition, and may subsequently exercise BasicMed. Persons who have, or are newly diagnosed with, a cardiovascular, neurological, or mental health condition described in FESSA, may not use BasicMed until they have been found eligible for special issuance of a medical certificate. Once issued a medical certificate, the person may then use BasicMed if they meet all other requirements of FESSA. These conditions are listed below:
- 8.2.1 A mental health disorder, limited to an established medical history or clinical diagnosis of any of the following:
1. Personality disorder that is severe enough to have repeatedly manifested itself by overt acts.
 2. Psychosis, defined as a case in which an individual:
 - Has manifested delusions, hallucinations, grossly bizarre or disorganized behavior, or other commonly accepted symptoms of psychosis; or
 - May reasonably be expected to manifest delusions, hallucinations, grossly bizarre or disorganized behavior, or other commonly accepted symptoms of psychosis.
 3. Bipolar disorder.
 4. Substance dependence within the previous 2 years, as defined in part 67, § 67.307(a)(4).

FAA: Substance Dependence

- A condition in which a person is dependent on a substance, other than tobacco or ordinary xanthine-containing (e.g., caffeine) beverages, as evidenced by....
- (1 or more of the following)

FAA: Substance Dependence (cont.)

- Increased tolerance
- Withdrawal symptoms
- Impaired control of use
- Damage to physical health
- Impairment of social / personal / occupational functioning

8.3 BasicMed Prohibitions for Persons with Mental Health Conditions.

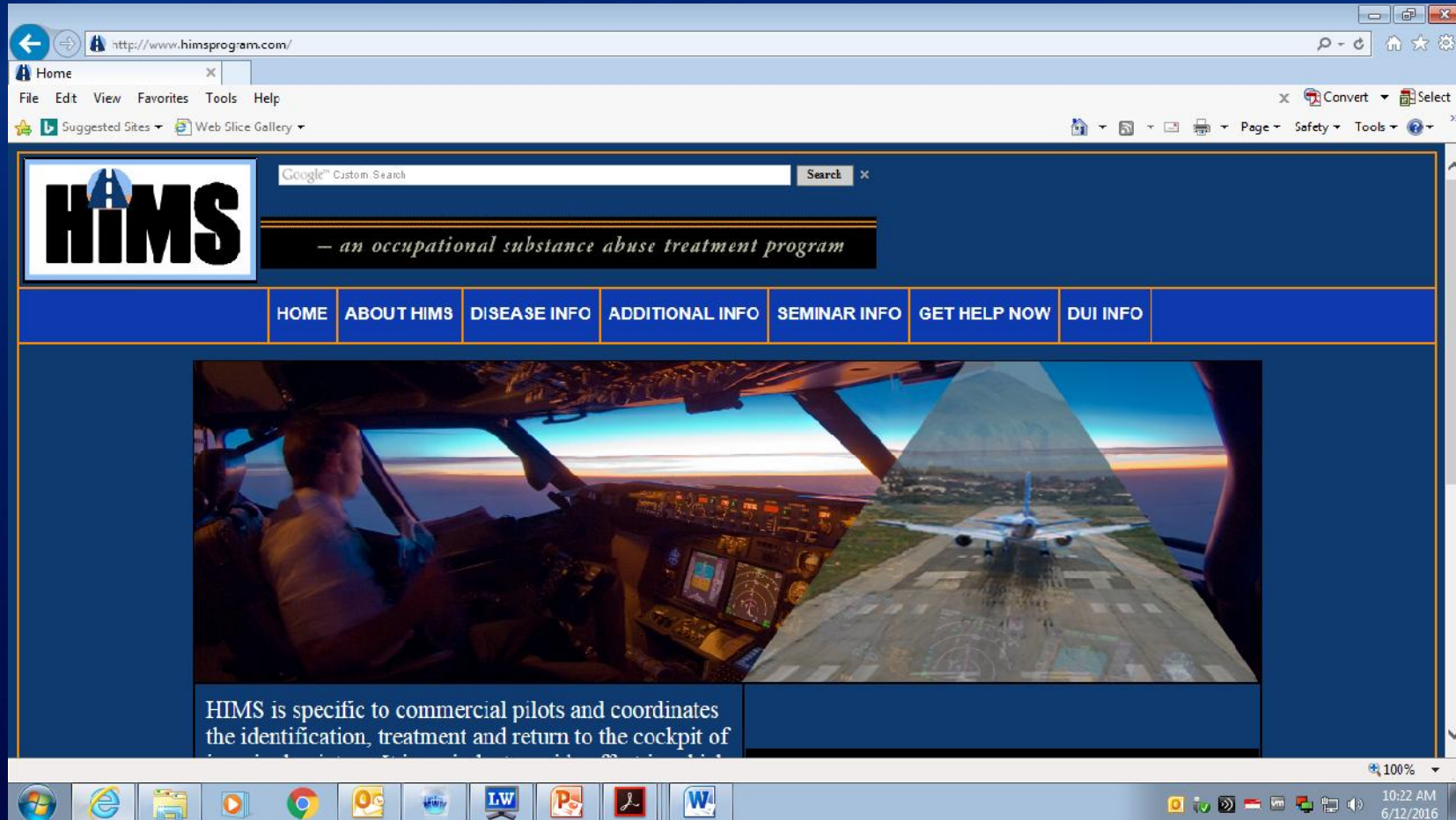
8.3.1 Section 68.9(c)(1)(i) prohibits an individual with a clinically diagnosed mental health condition from exercising BasicMed privileges if, in the judgment of the individual's state-licensed medical specialist, the condition:

1. Renders the individual unable to safely exercise BasicMed privileges; or
2. May reasonably be expected to make the individual unable to exercise BasicMed privileges.

8.3.2 Section 68.9(c)(1)(ii) prohibits a person from exercising BasicMed privileges if the person's driver's license is revoked by the issuing agency as a result of a clinically diagnosed mental health condition.

8.4 BasicMed Prohibitions for Persons with Neurological Health Conditions. Under

Human Intervention Motivation Study (HIMS)



The screenshot shows a web browser window displaying the homepage of HIMS (Human Intervention Motivation Study). The browser's address bar shows the URL <http://www.himsprogram.com/>. The page features a search bar with the text "Google Custom Search" and a "Search" button. Below the search bar is the HIMS logo, which consists of the letters "HIMS" in a bold, black font with a blue and white graphic element above the "I". To the right of the logo is the tagline: *— an occupational substance abuse treatment program*. A navigation menu is located below the tagline, with buttons for HOME, ABOUT HIMS, DISEASE INFO, ADDITIONAL INFO, SEMINAR INFO, GET HELP NOW, and DUI INFO. The main content area features a large image of a pilot in the cockpit of an airplane, looking out over a runway at sunset. Below the image, the text reads: "HIMS is specific to commercial pilots and coordinates the identification, treatment and return to the cockpit of". The browser's taskbar at the bottom shows various application icons, including Internet Explorer, File Explorer, and several instances of Google Chrome. The system tray in the bottom right corner displays the date and time: 10:22 AM, 6/12/2016.

Himsprogram.com

Occupational
Alcohol Addiction
Treatment
Program (1970s)



Drugs of Abuse



4 SSRIs (2010)



HIMS today (2016)



Alcohol / Drug Monitoring



SSRI Protocol

- Citalopram
- Escitalopram
- Sertraline
- Fluoxetine

What is disqualifying?

- Specifically disqualifying **All Classes:**
14 CFR 67.107(a), 67.207(a), and 67.307(a)
 - Personality disorder that is severe enough to have repeatedly manifested itself by overt acts
 - Bipolar disorder
 - Psychosis

FAA Definition of Psychosis

- Delusions
- Hallucinations
- Grossly bizarre / disorganized behavior
- Other commonly accepted symptoms
- May be reasonably be expected to manifest any of the above

So.. why isn't depression specifically disqualifying??

- “Depression” per se is not, sort of...
- Allows for AME discretion
- Depressive disorders are “covered” under “Other” mental health conditions

Specifically disqualifying **All Classes: 14** **CFR 67.107(c), 67.207(c), and 67.307(c)**

- No other personality disorder, neurosis, or other mental condition that [....]:
 - Makes the person unable to safely perform the duties or exercise the privileges of the airman certificate applied for or held; OR
 - May reasonably be expected, [to manifest the above for the medical certificate duration]

When you get into the details... (Part 1/3)

- Must be denied / deferred:
 - Bipolar
 - Psychosis
 - Personality disorder
 - Substance abuse
 - Substance dependence
 - ADHD
 - Suicide attempt

When you get into the details... (Part 2/3)

- “*May* also warrant denial or deferral”:
 - Adjustment disorder
 - Bereavement
 - Dysthymic state
 - Minor depression
 - Psychotropic meds for nicotine cessation

When you get into the details... (Part 3/3)

- What about mental disorders secondary to a medical condition, that lead to a cognitive deficit?
 - May not involve psychosis
 - “Considered” disqualifying but...
 - ...if caused by trauma or toxins, *may not* be disqualifying

My take...

- Delegates authority to AME in instances of adjustment disorders / other
- If on an SSRI, med trumps diagnosis
 - Even for adjustment disorders
 - Flexibility to apply for non-depressive disorders using SSRI Tx

AME may issue IF...

- Stable, resolved, no thought disturbance, one episode; no meds OR med < 6 mo. duration and discontinued > 3 mo ago
- Applies to:
 - Adjustment disorders
 - Bereavement
 - Dysthymic states
 - Minor depression
- Meds / nicotine cessation
 - DC'd > 30 days ago & no side effects

Psychiatric Portion of 8500

- General impression
 - Emotional stability & mental state
- NOT a psychiatric exam

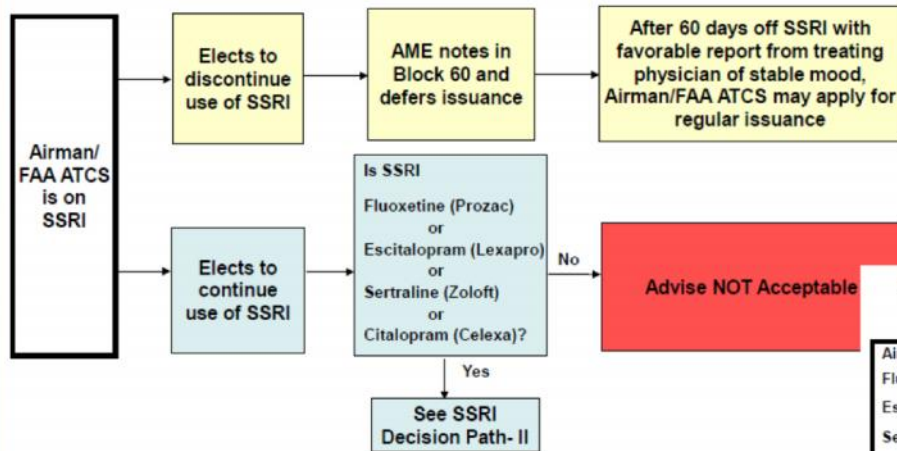
Mental status guidelines aka tips from an aerospace psychiatrist-FS

- Establish rapport / alliance
- General observations
 - Appearance, behavior, mood, communication, memory, cognition
- Not rocket science!
- Document block 60
 - Quote / paraphrase / theme(s)

FAA Policy on Antidepressant (AD) Therapy

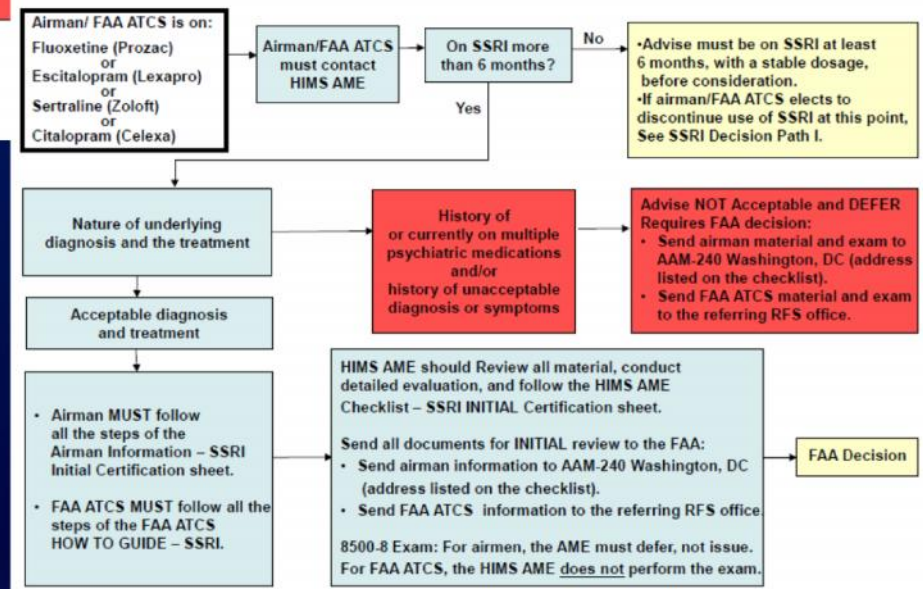
SSRI Decision Path - I

(Updated on 03/29/2017)



SSRI Decision Path – II (HIMS AME – INITIAL Certification/ Clearance)

(Updated 03/29/2017)



Simplifying the AD “sticky wicket” (1 of 2)

- Only 4 SSRIs authorized, no others.
Period.
 - Citalopram, escitalopram, fluoxetine, sertraline
- Any Hx of depression treated with any AD (even if stopped) → DEFER
 - For sure if AD Tx > 6 mo.
 - If < 6 mo, *consider* adjustment d/o (only possible exception to issue)

Simplifying the AD “sticky wicket” (2 of 2)

- If on SSRI but stops → DEFER
 - Note in block 60
 - Obtain psych evaluation \bar{p} 60 days
 - If favorable, apply for regular issuance
- If on SSRI for maintenance → DEFER
 - Minimum 6 mo. stable dose
 - Establish w/ HIMS AME (→ DEFER)
- Perform FAA CERTIFICATION AID – SSRI INITIAL Certification/Clearance

FAA CERTIFICATION AID – SSRI INITIAL Certification/Clearance

FAA CERTIFICATION AID – SSRI INITIAL Certification/Clearance (Page 1 of 5)

(Updated 03/29/2017)

The following information is to assist your treating physician/ provider who may be unfamiliar with FAA medical certification/clearance requirements. It lists the ABSOLUTE MINIMUM information required by the FAA to make a determination on a medical certificate for airmen or clearance for FAA ATCS. You should strongly consider taking a copy to each evaluator so they understand what specific information is needed in their report to the FAA. If each item is not addressed by the corresponding provider, there may be a delay in the processing of your medical certification or clearance until that information is submitted. Additional information such as clinic notes or explanations should also be submitted as needed. All reports must be CURRENT (within the last 90 days) for FAA purposes.

REPORT FROM	MUST SPECIFICALLY ADDRESS OR STATE THE FOLLOWING (SSRI INITIAL Certification/Clearance Evaluation)
AIRMAN or FAA ATCS	<ol style="list-style-type: none"> 1. A typed statement, <u>in your own words</u>, describing your mental health history, antidepressant use, and any other treatment. At a minimum, you must include the following information: <ol style="list-style-type: none"> a. Symptoms: when started, what type, and when/how you first sought treatment. b. List all providers you have seen for any mental health condition(s) and dates. c. List all medications you have taken, dates they were started and stopped, whether they helped or not. d. List any other treatment(s) you have utilized, dates they were started and stopped, if they helped or not. e. List dates and locations of any hospitalizations due to any mental health condition. If you have not had any, that must be stated. f. Describe your current status: current medication dose, how long you have been on it, and how you function both on and off the medication. 2. Sign and date your statement. 3. Provide copies of all of your medical/treatment records related to your mental health history (to include any treatment records for past related symptoms where you were NOT on SSRI as well as from the date you began treatment to the present) and a sign two release forms* for the FAA to release a complete copy of your FAA medical file to your HIMS AME and to a board certified psychiatrist (if your treating physician is not a psychiatrist). *For ATCS release form information, contact your RFS office.
HIMS AME	<ol style="list-style-type: none"> 1. Evaluation MUST be a face-to-face, in person, and this must be noted in your report. 2. Record review verification: Verify that you have reviewed (a) complete copy of the airman/FAA ATCS's Agency medical file, (b) the treating physician and/or psychiatrist reports (as required), and (c) neuropsychologist report (as

FAA will require additional documentation:

- Personal statement
- All treatment records
- Summary letter from prescriber
- Psychiatry evaluation (or summary)
- Neuropsychological evaluation
 - HIMS-trained → Cogscreen
 - Additional tests if required
- Agreement to notify FAA of change in airman's psychological status / stability
- Other documentation depending on Class

Occupational
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Program (1970s)



www.himsprogram.com

Drugs of Abuse

4 SSRIs (2010)

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- Sertraline
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HIMS today (2016)

Alcohol / Drug Monitoring

SSRI Protocol

Mental Fitness to Fly: Pathway to Psychiatric Certification

- Disqualifying diagnoses
- FAA policy on depression
- Your observation is key!
- Understanding HIMS SSRI protocol
 - Preparing your airman for it



Questions & Discussion