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INDEPENDENT REGULATORY
REVIEW COMMISSION

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BUREAU OF COMMUNITY PROGRAM
LICENSURE AND CERTIFICATION

Janice Staloski, Director
Bureau of Community Program Licensure and Certification
Pennsylvania Department of Health
132 Kline Plaza, Suite A
Harrisburg, PA 17104-1579

Dear Ms. Staloski:

Thank you for the opportunity to comment upon the proposed changes to Pa. Code 255.5. As a psychiatrist who is board certified in addiction psychiatry, and on behalf of Community Care, I wanted to express my strong support for these revisions. The current version of the code significantly hinders our ability to assist members with coordination of their care. In addition, the information allowed does not enable us to effectively assess whether patients' conditions meet PCPC criteria.

The revised criteria will significantly address these limitations. The only specific suggestions we have are:

- a.) To note on page 4, item C, that the medical conditions and medications are intended to include mental health conditions and medications.
- b.) On page 5, items G, to enumerate housing, e.g., "The patient's social support system, housing, environmental supports and stressors that may impact ongoing recovery." We often find housing to be a primary barrier to discharge and our inability to often access information about housing status has limited our ability to help address this need.

Please feel free to contact me with any questions about these comments.

Sincerely,

James Schuster, MD, MBA
Chief Medical Officer
Community Care

Cc: Mary Diamond, Medical Director, OMHSAS
Joan Erney, Deputy Secretary, DPW