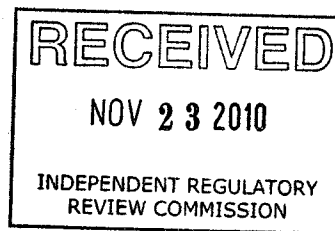


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November 22, 2010

Shaye Erhard  
Office of Mental Health and Substance Abuse Services  
233 Beechmont Building  
DGS Complex  
Harrisburg, PA 17105-2675  
(See via e-mail to ra-rtfcomments@state.pa.us)

Dear Ms. Erhard,

The Pennsylvania Society for Clinical Social Work [PSCSW] wishes to provide the following comments on the Proposed Rulemaking Residential Treatment Facilities [55PA. CODE CHS.23, 3800 and 5310]. We are particularly concerned with the educational and training qualifications of staff as stated in 23.52. Since the aim of these facilities is to provide high quality behavioral services for children, it is important that administrative and service staff are required to be fully educated for that goal.

A director [23.53] needs not only education to administer such a facility but also to understand the education and training needs of staff he or she will hire. This administrator will also set the standards for treatment along with the Medical and Clinical Directors, so this administrator should have had sufficient prior experience to know the standards of care for children with a very wide range of diagnoses and behaviors. A minimum education should be a master's degree in the human services field and six years experience since most master degree human service workers don't get fully licensed until a minimum of 2 years of experience which can take up to 6 years experience. If one such prospective administrator works for one year with autistic children and one year with drug and alcohol addicted youth for example, he or she would have had no exposure and education in working with mental illness. Two years is not nearly enough and a bachelor's degree is not enough. This person needs the professional training that is available in at least a master's or doctorate program in psychology, clinical social work or marriage and family therapy.

The medical director [23.54] should be a psychiatrist but one who has had more than two years out of his or her residency. This is the person who is responsible for supervision of staff and to do that this director needs to have had multiple institutional experiences. Why require only two years when more would prepare this person to do more than a mediocre job?

We insist that the Clinical Director [23.55] should also have more than two years experience since it takes a minimum of that to get a clinical license and this position needs to be licensed. There are several reasons why this position needs to be licensed. One is that insurance only reimburses licensed personnel and the facility needs to be reimbursable for budgetary reasons. Another reason is that the Clinical Director needs to have had exposure to and understanding of as many of the possible diagnoses of the resident children, as the Clinical Director will be the direct supervisor of the line staff, as well as possibly doing a lot of the group and family therapy. The line staff, mental health professionals, etc., depend on the Clinical Director on a daily basis for supervision and to provide orientations to new staff and trainings throughout the year. Don't short change the children by hiring undereducated staff.

In addition to the Clinical Director needing to have the appropriate credentials and experience, the rest of the professional staff needs to as well. Therefore, PSCSW strongly urges that the regulation be changed to require licensure for clinical mental health professionals as well as to allow for provisional employment for those in the process of gaining the necessary hours to earn a clinical mental health license. The goal is to ensure that children in residential treatment facilities receive the highest level of care possible. The licensure standards of education, passing a competency exam and demonstrating ability in providing clinical services while operating in a supervised setting, have been created to protect clients. However, our public system does not utilize the same professional standards for service delivery that the private insurance system does. This problem is compounded by the fact that clients in the public system typically have little or no choice about their provider. Those clients need the assurance of knowing that they are being treated by fully educated, trained and licensed professionals.

PSCSW thinks this is the time to make sure that the neediest and poorest Pennsylvanian children get excellent residential treatment as needed. To do that, the very least is to make sure that the hired professional staff are well trained.

Sincerely Yours,

Virginia C. McIntosh, LCSW, BCD  
PSCSW Legislative Chair

Joan Pollak, LCSW, BCD  
PSCSW President

**Erhard, E. Shaye**

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**From:** David Tive [dtive@tivelobbying.com]  
**Sent:** Monday, November 22, 2010 2:08 PM  
**To:** PW, RTFComments  
**Subject:** Comments on proposed regulations for Residential Treatment Facilities  
**Attachments:** RTFs rulemaking comments.doc

Attached please find comments from the PA Society for Clinical Social Work on the proposed regulations for resident treatment facilities.

Thank you.

David Tive  
Tive Lobbying  
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