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American Psychological  
Association

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**PENNSYLVANIA PSYCHOLOGICAL  
ASSOCIATION**

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November 18, 2010

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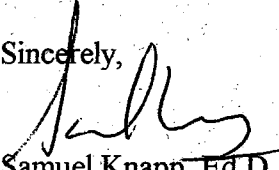
Shaye Erhard  
OMHSAS  
233 Beechmont Building  
DGS Complex  
PO Box 2675  
Harrisburg, PA 17105-2675

Dear Shaye Erhard:

On behalf of the Pennsylvania Psychological Association, I am writing concerning proposed rule making on Residential Treatment Facilities which was recently published in the *Pennsylvania Bulletin*.

We believe that the proposed regulations do not adequately differentiate between the duties of the medical director and the clinical director (Sections 23.54 and 23.55). We note a statewide shortage of psychiatrists and an increasing difficulty in finding psychiatrists to prescribe medications. Nonetheless, the medical director is specifically required to have regular and on going contact with community agencies and natural supports, and participation in treatment team meetings, among other duties. It would seem that many of these functions could best be delegated to the clinical director.

Sincerely,

  
Samuel Knapp, Ed.D.  
Director of Professional Affairs

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