

PCPA



Pennsylvania  
Community  
Providers  
Association

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April 1, 2013

William Boyer, Section Chief, Program Development  
Office of Mental Health and Substance Abuse Programs  
DGS Annex Complex  
21 Beech Drive  
Harrisburg, PA 1710

RE: Psychiatric Rehabilitation Services Final-Form Regulations (14-521), IRRC No. 2879

Dear Mr. Boyer:

The Pennsylvania Community Providers Association (PCPA) promotes excellence in the provision of community health and human services through advocacy, education, and support. The association advances member commitment to improving the quality of life and community well-being for all Pennsylvanians, especially those who are at risk of or face the challenges of mental illnesses, substance use disorders, addictions, intellectual, and/or developmental disabilities. PCPA strongly supports the final rules for psychiatric rehabilitation services and encourages the Independent Regulatory Review Commission to approve the regulatory package. There have been multiple efforts over many years to develop comprehensive regulations for psychiatric rehabilitation services. As the importance of quality psychiatric rehabilitation services to recovery for many is recognized, minimum standards for service provision are needed. This regulatory document provides that standard. There are several points with which PCPA has concerns, but these concerns do not rise to the level of opposition to the final-form regulation. These concerns are identified below.

§ 5230.3. Definitions.

*LPHA – Licensed practitioner of the healing arts includes a physician, physician assistant, certified registered nurse practitioner, and psychologist.* Language in the proposed regulation is preferred as it allowed other qualified professionals recognized by the Department of Public Welfare (DPW) to recommend services. This would presumably include licensed clinical social workers (LCSW), who might have the closest relationship and best understanding of the strengths and needs of the individual. Although language in the final-form rulemaking does not consider the LCSW as a licensed practitioner of the healing arts,

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PCPA is hopeful that this definition may be revisited in the future as the regulation and practice of psychiatric rehabilitation services evolves.

§ 5230.14. Physical site requirements.

*A PRS agency shall provide: ...(2) PRS as a service that is distinct from other mental health services that may be offered by the legal entity: (i) In terms of service content. (ii) In terms of physical space utilized.* As stated previously in comments to the proposed regulations, PCPA is concerned that currently successful programs that are co-located with outpatient services could be jeopardized if this requirement is interpreted as a need for separate and distinct physical space.

§ 5230.21. Content of individual record.

*(3) Referral source, reason for referral and recommendation by an LPHA.* Even though PCPA recognizes the need for a recommendation by a licensed practitioner in order for Medical Assistance payment to be made, it is anticipated that this requirement will create delay and a barrier to service for of some individuals.

§ 5230.55. Supervision.

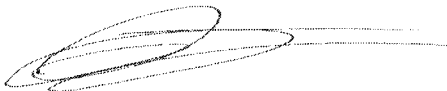
*(c) A PRS director or psychiatric rehabilitation specialist designated as a supervisor shall meet with staff individually, face-to-face, no less than two times per calendar month.* PCPA concerns regarding the proposed rule remain. More flexibility in supervision is needed to meet the needs of individual employees. Some may need more face-to-face interaction, while others need less. This level of specificity should not be addressed in regulation.

§ 5230.56. Staff training requirements.

Providers continue to have concerns about the costs of training requirements. DPW has eased the cost somewhat by providing some training by webinar, but providers must continue to staff programs while training is conducted for others.

Thank you for the opportunity to participate in development of psychiatric rehabilitation services regulations. Please address any questions regarding this letter of support and comments on the final-form rulemaking to me at [betty@paproviders.org](mailto:betty@paproviders.org), or 717-364-3280.

Sincerely,



Betty M. Simmonds  
Policy Specialist

CC: IRRC