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National Association of Social Workers

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Department of Public Welfare
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Harrisburg, PA 17105-2675

Nov. 18, 2010

BUREAU OF POLICY AND PROGRAM DEVELOPEMENT

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RE: Comments on Regulation #14-521

Dear Ms. McMullen,

The National Association of Social Workers, Pennsylvania Chapter is pleased to submit formal comments to draft regulations issued address Chapter 5230 Psychiatric Rehabilitation Services by the Department of Public Welfare. These are important regulations ensuring the appropriate standards are met for psychiatric rehabilitation services. However, the National Association of Social Workers (NASW-PA) has some significant concerns related to the staff qualifications as outlined in section 5230.50 on page 23 of the draft regulations.

We fear that the workforce standards included in these regulations set providers and clients up for treatment failures. If we want quality and cost effective services to be delivered, they must be delivered by professionals who are appropriately educated, trained, and licensed to deliver clinical mental health services. Any individual seeking psychiatric rehabilitation services has the reasonable right to expect that the individuals delivering mental health services have achieved the appropriate educational and competency level.

Based on the need to ensure that services are effective and that the best interest of the public are protected, NASW-PA strongly urges the Department of Public Welfare to raise the standard to serve as a Psychiatric Rehab Program Director to a master's degree and a current clinical license issued by the Commonwealth of Pennsylvania. And, that the standard for a Psychiatric Rehabilitation Specialist be raised from a bachelor's degree to a master's degree in marriage and family therapy, social work or a field of counseling or psychology.

The Commonwealth would not issue regulations for the delivery of medical services and allow any person with an undergraduate degree to deliver those services. It is equally inefficient and fiscally irrational to issue regulations for critical mental health services and not require the leadership of that clinical team to hold a license as a clinical mental health provider. Ideally, any person delivering clinical services would be licensed, but NASW-PA recognizes that changing workforce standards is a slow process. To that end, moving toward the standard that those who deliver clinical services be appropriate degreed would be the first step toward incremental and manageable system improvement.

NASW-PA is aware that providers will defend a system where the entity and not the individual provider are licensed. This model does not appropriately serve the best interest of those seeking mental health services. An individual's mental health is as critical to their functioning as their physical health and until we have workforce standards that reflect the critical nature of mental health work, we will fail as a Commonwealth to appropriately protect the best interests of vulnerable citizens.

The National Association of Social Workers, as well as our partner mental health professions, would be happy to work with the Department of Public Welfare to create and implement workforce standards that would provide a greater likelihood of success from the clients who so desperately need these critical services.

Sincerely,

Jenna Mehnert, MSW, ACSW
Executive Director
National Association of Social Workers – PA Chapter