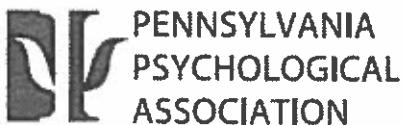


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Independent Regulatory
Review Commission

3176



PENNSYLVANIA
PSYCHOLOGICAL
ASSOCIATION

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Agency: Department of Human Services
IRRC 3176- Outpatient Psychiatric Services and Psychiatric Outpatient Clinics
Regulation #14-538

To Whom It May Concern:

On behalf of the Pennsylvania Psychological Association, we are writing concerning regulation #14-538, IIRC #3176. The proposed regulations have many positive features in that they reduce unnecessary paper and, with the utilization of advance practice nurses and physician's assistants, and telehealth services will mitigate the problem caused by Pennsylvania's shortage of psychiatrists. Because of the urgency in addressing these acute problems, we are not opposing these regulations.

However, we note that these regulations remain obsolete because, among other reasons, they contain numerous provisions that inhibit the movement toward integrated care. Integrated care occurs when entities offer medical and behavioral health services within one setting. Integrated care has become a major driver of changes in the health care system and is especially important for patients with chronic and serious conditions. The failure to address these concerns means that patients will receive less-than-optimal health care at a higher cost to the Commonwealth and other payers.

Specifically, the regulations should remove the requirement that patients have a mental illness to be eligible for services; treatment options should include behavioral interventions designed to address specific medical conditions, such as chronic pain; treatment plans should have the option of being included in medical treatment plans; and the supervisors of these services should include non-medical physicians or psychologists when appropriate.

We will continue to advocate for these important concerns but will not oppose these proposed regulations. Thank you for considering our concerns.

Sincerely,

Rachael Baturin

Rachael Baturin, MPH, JD
Director of Governmental, Legal & Regulatory Affairs

Samuel Knapp

Samuel Knapp, Ed.D., ABPP
Director of Professional Affairs