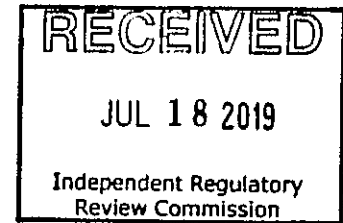




MOVING AGENCIES TOWARD EXCELLENCE



**TESTIMONY OF MAX ASSOCIATION
ON REGULATION 14-538
“OUTPATIENT PSYCHIATRIC SERVICES AND OUTPATIENT PSYCHIATRIC
CLINICS”
JULY 18, 2019**

Good morning Mr. Chairman and members of the Commission. My name is Diane Conway and I am the Executive Director of MAX Association, an association of human service providers in Southeast Pennsylvania. So my comments are on behalf of those members organizations who have outpatient services and outpatient psychiatric clinics.

Thank you for the opportunity to testify to the commission on Regulation 14-538 “Outpatient Psychiatric Services and Outpatient Psychiatric Clinics”.

In short, MAX Association urges the Independent Regulatory Review Commission to approve this regulation. While this regulation update has taken an exceptional amount of time in the regulatory development, review and approval process these proposed regulations are a significant improvement to the current outdated regulations.

Moreover, today, I would like to address a larger issue – the issue of regulatory reform in Pennsylvania. MAX certainly understands the importance of and supports the intent to keep people safe. However, the current regulatory process may be counter-productive to that very intent. Some regulations, especially those governing clinical practices such as this one before you today on outpatient psychiatric services, lag far behind clinical best practices and the environment in which they are delivered. As providers of clinical services and practitioners, we are guided by research determining current best practices, but are sometimes limited in our capacity to deliver best practice by outdated regulations that do not recognize progress in our industry. So the dilemma providers find themselves in when regulations are in effect for decades, is that they are out of compliance with statutory regulations if they employ best treatment practices.

Our industry is ready to raise the bar on quality standards and to engage consumers holistically using new technology – meeting an individual’s needs more flexibly and effectively. We want regulations and billing practices that acknowledge that need for flexibility. We request that this is the last time that we see a regulatory update take so many years. We request that there be a

process for regular, timely review of regulations and that providers and stakeholders play an active role in the process.

While MAX urges the Commission to approve this outpatient regulation, it more importantly urges the Commission to look at reforming the regulatory review process to eliminate the future possibilities that regulations hold providers back from employing best practices and being instrumental in the evolution of services.

Thank you for your time and consideration of these comments.

Sincerely,
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