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Champa, Heidi

From: Candace Ross <cross@tcv.net>
Sent: Tuesday, August 15, 2017 4:26 PM
To: PW, OPCRegs
Subject: proposed outpatient regulations

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Hello, I have an issue with the proposal of LPHA while ignoring LCSW and LPC master's level therapists:

("LPHA—*Licensed practitioner of the healing arts*—A person who is licensed by the Commonwealth to practice the healing arts. The term is limited to a physician, physician's assistant, certified registered nurse practitioner or psychologist."

And also "Mental health professional—[A person trained in a generally recognized clinical discipline including but not limited to psychiatry, social work, psychology or nursing, rehabilitation or activity therapies who has a graduate degree and clinical experience.] A person who meets one of the following:

(i) Has a graduate degree from a college or university that is accredited by an agency recognized by the United States Department of Education or the Council for Higher Education Accreditation (CHEA) in a generally recognized clinical discipline which includes mental health clinical experience.")

There is no distinction of a licensed Master's level therapist (LCSW, LPC) from an unlicensed master's level therapist in training. We are not prescribers, but our presence is distinct and usually involves a lot of experience and training. As a supervisor, I have a great amount of difficulty staffing and keeping licensed individuals in an outpatient setting, and the pay is a reason. I am a licensed clinician, and know that I could make more money elsewhere, but my commitment is in community mental health, as both a provider and a supervisor so that new therapists can be adequately trained to be excellent clinicians.

Please consider changing the terminology to "Unlicensed Mental health professional " and "Licensed Mental health Professional", respectively.

Regards,

Candace Ross
MSW, LCSW, MAC, CIP
Outpatient Adult Clinical Supervisor
519 Penn Avenue
Turtle Creek, PA. 15145
TCV Community Services
Tel/Ext: 412-824-8510/6608
Fax: 412-824-0948

Web: www.tcv.net

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