

14-538-14

Champa, Heidi

#3176

From: Christine Kuntz <ckuntz@atlanticbb.net>  
Sent: Friday, September 08, 2017 9:10 AM  
To: PW, OPCRegs  
Subject: comment to reference regulation No. 14-538

I wish to comment on the proposed changes to the Mental Health Regulations at 55 Pa. Code Chapter 5200 published in the August 12, 2017, Pennsylvania Bulletin.

I wish to address a singular issue; the definition of "advance practice professional" defined at §5200.3. I strongly entreat the Department to expand the definition to allow CRNP who have at least one year experience in behavioral health. Physician Assistants are granted this expansion and I am not aware of any evidence-based reasons to excluded experienced CRNPs. At a minimum, CRNP certified in family practice should be eligible "advance practice professionals", as family practice professional regularly address mental health with their patients.

Also, the proposed regulation does not grandfather non-mental health certified CRNP. This will hurt not only the CRNP currently practicing in mental health, but will also disrupt the delivery of mental health services as organizations struggle to find eligible professionals. To require currently-practicing CRNP to obtain additional education and training to perform what they have been performing for years presents an undue hardship. It will surely result in the loss of employment for many rural CRNP who cannot –due to money, time, travel, or geography - take a break from their employment to obtain this certification.

I applaud the Department's recognition of the value and need for advance practice professionals, but I disagree with the disparate certification requirements of CRNP and Physician Assistant. Citizens in rural areas desperately need access to mental health and already face severe shortages of services. It is extremely difficult to hire mental health certified CRNP in rural areas. The wage differentials between urban and rural areas make this nearly impossible. In addition, rural areas are have limited or no access to the education required to obtain the certification, further reducing eligible applicants.

In closing, I strongly urge the Department to redefine "advance practice professionals" to include CRNP who are either certified in mental health or have one year experience.

Sincerely,  
Christine Kuntz

Thank you for your consideration of my comments.

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