

From: Steven Kossor <sakossor@ibc-pa.org>
Sent: Sunday, September 10, 2017 2:48 PM
To: IRRRC
Subject: IRRRC # 3176 DHS proposed regulation for Mobile Mental Health Services

It is wrong, and contrary to the public interest, to exclude physicians (especially psychiatrists) and psychologists as independently licensed practitioners of the healing arts in Pennsylvania who are enrolled in Medicaid as practitioners from providing Mobile Mental Health Services and instead to allow only "facilities" or "agencies" to provide such services as the proposed regulations do. Independent licensed practitioners enrolled in Medicaid are easily monitored for compliance with regulations and are conscientious advocates for the needs of their patients/clients. Restricting Mobile Mental Health Providers only to "facilities" or "agencies" creates a barrier to the entry of qualified independent practitioners of mental health treatment which is unnecessary, and prevents the public from exercising reasonable choice over their providers of Medicaid funded treatment (especially mental health treatment) in the least restrictive setting and violates Olmstead's requirement for community based options for treatment in the home which are otherwise available through Medicaid (especially in the EPSDT benefit).

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