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**Champa, Heidi**

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**From:** Anne Marz <amarz@barberinstitute.org>  
**Sent:** Monday, September 11, 2017 12:45 PM  
**To:** PW, OPCRegs  
**Subject:** OPMH Clinic regulatory proposed changes  
**Attachments:** Anne Marz comments (9.11.17)v2.pdf

Good Afternoon,

Thank you for the opportunity to review the proposed changes of 55 PA Code Chapters 5200 and 1153. Please see attached comments.

Respectfully,

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Comments on the Proposed Rulemaking

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Department of Human Services

2017 SEP 13 A 11: 30

Outpatient Psychiatric Services and Psychiatric Outpatient Clinics \

55 PA Code Chapters 1153 and 5200

1153.2-Definitions

The definition of Psychiatric Evaluation, "an initial mental status examination and evaluation of an individual provided only by a psychiatrist in a face-to-face interview or using real-time, two-way interactive audio-visual transmission with prior written approval from the Department with the individual". Recommendation to update to "an initial mental status examination and evaluation of an individual provided only by a psychiatrist in a face-to-face interview or using real-time, two-way interactive audio-visual transmission" and remove "with prior written approval from the Department".

ii. Removal of the statement "with prior written approval from the Department" will allow for individuals to achieve quicker access to psychiatric care resulting in a stabilization of symptoms, continued advancement towards recovery and the client's contribution to the community.

1153.14 Noncovered Services

a. Number 9 states that "Psychiatric outpatient clinic services, MMHT and psychiatric partial hospitalization provided on the same day to the same individual" are noncovered services.

i. Recommendation to remove this statement. This recommendation will allow for an individual to receive two different services, such as individual psychotherapy and medication management during the same day resulting in comprehensive recovery focused care. It will also permit two services, such as an outpatient clinic intake appointment, while still active in a partial hospitalization program. This creates a smooth and timely transition of care and decreases rates of recidivism with support from the exiting level of care.

b. Number 1 states "A covered psychiatric outpatient clinic, MMHT or partial hospitalization service conducted over the telephone."

i. Recommendation is to remove this statement. This recommendation will allow for an individual to be supported during times of crisis by practitioners, thus decreasing hospital admission rates and contributing to the financial stability of the mental health system of care.

5200.31 -Treatment Planning

a. Section indicates "The initial treatment plan shall be signed by the mental health professional, the psychiatrist and the individual receiving services."

i. Recommendation to amend to "The initial and subsequent treatment plans shall be reviewed and signed by the mental health professional, the advanced practitioner and the individual, or

consenting family member for individuals under the age of 14, receiving services.” This will encourage the advanced practitioner to work to the highest level of their license while continuing to engage the individual/family.