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Champa, Heidi

From: dwood7 <dwood7@ptd.net>
Sent: Saturday, September 09, 2017 1:56 PM
To: PW, OPCRegs
Cc: rfernand; jcooper; Jonathan Vipond
Subject: OP Regulation Comments
Attachments: Devereux - Comments on DHS OP Regulations 09.09.17.doc

Please accept the attached comments from CBHS - Devereux Foundation on the proposed outpatient regulations. We are certainly willing to respond to any comments or suggestions prompted by the attached comments.

Thank you for your consideration.

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Devereux Foundation – CBHS: Comments on the Proposed Rulemaking DHS Outpatient Psychiatric Services and Psychiatric Outpatient Clinics

Devereux Foundation appreciates the effort and energy the Department has taken to amend 55 PA Code Chapters 1153 and 5200 relating to outpatient behavioral services and psychiatric outpatient clinics. Please accept the following comments on the proposed regulations:

1. The term "licensed practitioner" is used in sections §1153.41 (10), §5200.42 (a)(1) and §5200.42 (b)(1), however, the term is not included in the definitions at §1153.2 or §5200.3.
2. "Advanced Practice Professional" and LPHA is included at §5200.3 but neither are included in definitions at §1153.2. Note: Advanced practice professional usually includes within the definition that they practice under the supervision of and within a collaborative agreement with a physician.
3. If the goal is to utilize advanced practice professionals to extend access and quality of outpatient services measure throughout the Commonwealth, then perhaps the definition of "licensed practitioner" could be expanded to "licensed medical practitioner" to include a physician, CRNP and/or PA. This would allow the advanced practice professional working under the supervision and collaborative agreement with a physician to write prescriptions for medications and orders for their dispensing.
4. This does not interfere with definitions at §1153.2 pertaining to which professionals can conduct general and clozapine medication clinics. It would allow the CRNP and PA conducting a medication clinic where an adjustment is required to write new or modified prescriptions within their collaborative agreement – making routine visits more efficient and effective for individuals receiving services.

[Devereux – Comments on DHS OP Regulations 09.09.17]

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