

14-538-34

Champa, Heidi

From: Susan Weltmer <Sweltmer@haponline.org> on behalf of Jennifer Jordan <Jjordan@haponline.org>
Sent: Monday, September 11, 2017 4:34 PM
To: PW, OPCRegs
Subject: HAP Comments to Regulation No. 14-538
Attachments: HAP Comments on OMHSAS Outpatient Mental Health Regulations.docx

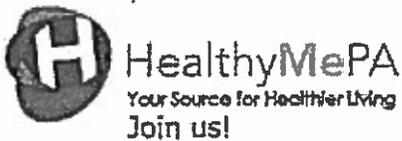
On behalf of The Hospital and Healthsystem Association of Pennsylvania (HAP), which represents approximately 240 member institutions, we appreciate the opportunity to comment about the Department of Human Services' (Department) proposed draft regulations for outpatient behavioral health services and psychiatric outpatient clinic services posted in the *Pennsylvania Bulletin* on August 12, 2017.

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Association of Pennsylvania



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The Hospital + Healthsystem
Association of Pennsylvania

Leading for Better Health

September 11, 2017

Department of Human Services
Office of Mental Health and Substance Abuse Programs
Attention: Michelle Rosenberger
Bureau of Policy, Planning and Program Development
Commonwealth Towers, 11th Floor
303 Walnut Street
P.O. Box 2675
Harrisburg, PA 17105-2675

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Re: HAP Comments to Regulation No. 14-538

Dear Ms. Rosenberger:

On behalf of The Hospital and Healthsystem Association of Pennsylvania (HAP), which represents approximately 240 member institutions, we appreciate the opportunity to comment about the Department of Human Services' (Department) proposed draft regulations for outpatient behavioral health services and psychiatric outpatient clinic services posted in the *Pennsylvania Bulletin* on August 12, 2017.

HAP applauds the Department's commitment to improving access to high-quality, outpatient behavioral health services. We recognize that the proposed rulemaking, outcome of a comprehensive stakeholder engagement process, takes meaningful steps to increase access to medically necessary treatment services for eligible individuals by allowing licensed professionals to work within their scope of practice in psychiatric outpatient clinics, reducing unnecessary administrative burden for licensed providers and supporting the provision of mobile treatment and telepsychiatry services. We welcome the proposed updates to the language throughout the regulations to reflect a person-first philosophy and better align with recovery principles.

HAP appreciates that the Department proposes substantial changes to Chapter 1153, outpatient behavioral health services including:

- Amending the definition of group psychotherapy by increasing the allowable maximum group size from ten to 12 individuals
- Adding the definition of Mobile Mental Health Treatment to provide access to psychiatric services, psychotherapy, and medication visits for individuals who are unable to attend treatment in a traditional outpatient psychiatric clinic setting due to documented mental or physical illness
- Amending the definitions of psychiatric clinic medication visit and psychiatric clinic clozapine monitoring and evaluation visit to include certified registered nurse practitioners and physician assistants in the list of professionals who may provide the visit



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- Amending the definition of psychiatric evaluation to include the provision of real-time, two-way interactive audio-video transmission in licensed psychiatric outpatient clinics

We also applaud the Department's effort to make related changes to Chapter 5200, psychiatric outpatient clinics to provide reimbursement necessary to support these services.

In reviewing the proposed changes related to telepsychiatry services, we noted that the language as proposed still limits that use of technology to expand access to those who need outpatient services. The language at 1153.14(6) appears to be somewhat at odds with the Department's stated goals of expanding access to evidence-based telepsychiatry services. The proposed language still precludes individuals from receiving telepsychiatry services in their homes. While the Mobile Mental Health Treatment services definition provides for service delivery in an individual's residence, those services are contemplated as face-to-face interactions. We are concerned that the mobile treatment model will not be available to meet the demand of individuals across Pennsylvania.

Given the Department's understanding of the value of telepsychiatry services in improving individuals' access to cost-efficient and high-quality therapies, HAP encourages that the Department clarify the proposed changes to allow for either the use of telepsychiatric modalities to deliver Mobile Mental Health Treatment services or for telepsychiatry services to be available to individuals in the comfort and convenience of their own homes. We encourage the Department to take even bolder steps to remove barriers to care and allow for the provision of telepsychiatry services in individual's homes.

Thank you for your consideration of our comments. If you have any questions or would like to discuss our comments further, please contact me at (215) 575-3741.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jennifer Jordan', with a long, sweeping horizontal line extending to the right.

Jennifer Jordan
Vice President, Regulatory Advocacy