

14-538-20

**Champa, Heidi**

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**From:** Deb Neifert <DNEIFERT@pacounties.org>  
**Sent:** Monday, September 11, 2017 12:02 PM  
**To:** PW, OPCRegs  
**Cc:** Lucy Kitner; Lisa Zook  
**Subject:** Outpatient Regulations  
**Attachments:** OP comments September 2017.pdf

Thanks for the opportunity to comment on the regulations. Please feel free to contact me if I can be of assistance.

Deb Neifert  
Deputy Director  
PACA MH/DS  
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2017 SEP 13 A 11: 29

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**PACA MH/DS**

PENNSYLVANIA ASSOCIATION OF COUNTY  
ADMINISTRATORS OF MENTAL HEALTH  
AND DEVELOPMENTAL SERVICES

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September 11, 2017

Michelle Rosenberger  
Office of Mental Health and Substance Abuse Services  
Bureau of Policy, Planning and Program Development  
Commonwealth Towers, 11<sup>th</sup> Floor  
303 Walnut Street  
PO Box 2675  
Harrisburg, PA 17105-2675

SUBMITTED VIA E-MAIL: [RA-PWOPCRegs@pa.gov](mailto:RA-PWOPCRegs@pa.gov)

Dear Ms. Rosenberger:

PACA MH/DS represents the 48 county mental health and developmental disability administrators in addition to the state managed care oversight agencies for behavioral health services. Our members support the amended 55 Pa. Code Chapters 1153 and 5200 relating to outpatient behavioral health services and psychiatric outpatient clinics.

The proposed regulations clearly reflect past stakeholder discussions in drafting the amended regulations. The amendments will promote the sustainability of outpatient psychiatric services and increase efficiency as noted by the incorporating tele-psychiatry as a standard practice and permitting additional prescribers without increased psychiatric time. We greatly appreciate the continued efforts to shepherd these regulations through the promulgation process to completion. In light of the length of time promulgation took, OMHSAS may want to convene another work group to ascertain any new areas that could further improve the development of efficient and effective outpatient services.

Thanks for the opportunity to comment on the outpatient regulations. PACA MH/DS looks forward to our ongoing collaborative approach in addressing systemic and programmatic concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "D. West", written in a cursive style.

Deputy Director