

14-538-36

Champa, Heidi

From: Kate Jackman <KateJackman@barberinstitute.org>
Sent: Wednesday, September 13, 2017 12:04 PM
To: PW, OPCRegs
Subject: Comments on Proposed Regulations to 55PA1153 and 5200
Attachments: Kate Jackman outpatient comments (9.11.17).pdf

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Michelle,

Thank you for the opportunity to review and comment on the proposed changes to 1153 and 5200. Attached please find a copy of my agreements and concerns with the proposed rules. If you have any comments or concerns please do not hesitate to contact me using the contact information below. Thank you again.

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Comments to DHS Proposed Rulemaking 55PA§1153 and §5200

1153.2 – Definitions

Mental Health Professional definition requirements include “mental health clinical experience”. We would recommend that either the definition be changed to state “clinical experience” or, that the department provide specific guidance on what constitutes “mental health clinical experience” as it is not defined in the regulations. A strict interpretation of “mental health clinical experience” will be burdensome to the provider and has the potential to lead to a staffing crisis.

1153.14 – Noncovered Services

(21) MMHT services provided as a substitute for transportation to the psychiatric outpatient clinic. We would ask that this statement be modified to state “MMHT services provided when transportation is the only barrier to the individual receiving treatment at an outpatient psychiatric clinic.” Transportation is a huge barrier to many people in our community, especially in rural areas, and we would request that this be taken in to account when finalizing the regulatory changes regarding MMHT covered services.

1153.14 – Noncovered services

(9) Psychiatric outpatient clinical services, MMHT and psychiatric partial hospitalization provided on the same day to the same individual. We would recommend that this statement be removed or revised. There are times where individuals can benefit from having psychotherapy and medication management services provided during the same date of service. Also, for continuity of care during transitions it would be beneficial for an individual to be able to participate in a partial hospitalization program and have an outpatient clinic intake/evaluation on the same date of service. For a revision we would request the addition of “without prior authorization” verbiage.

5200.31 – Treatment planning

We appreciate and approve of the changes made to the timelines for review and signature.

1153.2 – Definitions

Group psychotherapy. We approve of the increase in group size from 10 to 12.

1153.2 – Definitions

Psychiatric medication management. We appreciate and approve of the changes to allow CRNP’s and PA’s to provide this service