

14-548-5

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To whom it may concern,

For section 5230.51 Staff Qualifications, I recommend that the Adult Psychiatric Rehabilitation Services CPRP requirement for the Director and the Psychiatric Rehabilitation Specialist be reviewed.

I have operated Adult Psychiatric Rehabilitation Services for Adults in Philadelphia since 2010. During that time, it has been difficult hiring staff who possess a CPRP. At the same time, many staff are unable to pass the CPRP examination within two years of hire. It is a costly examination that is an added expense to operating Psychiatric Rehabilitation Services for Adults. My program has unfortunately lost many qualified staff over the years, who offered our members effective site based and community-based Psychiatric Rehabilitation Services. Also, however, I find that the 12 hour Psychiatric Rehabilitation Orientation requirement is very helpful for our staff.

I suggest three options to rectify this impediment to maintaining qualified staff:

- 1) If a Director or Psychiatric Rehabilitation Specialist attempts to pass the CPRP examination within the first two years of hire and fails the test two times, the Director or Psychiatric Rehabilitation Specialist is given another two years to pass the test.

This will require a review of the requirement to have at least 25% of the Adult Psychiatric Rehabilitation Services staff obtain a CPRP.

- 2) Lower the passing score of the CPRP test.
- 3) In this time of COVID related staffing shortages, waive this requirement until this hiring crisis passes, as it is currently reported there is a 24% vacancy rate for all Human Service positions in Pennsylvania.

Thank you for your consideration of adding these changes to the proposed Psychiatric Rehabilitation Services regulations for adults.

I'm available, at 215-450-7036, if you have any questions regarding my comments.

David

David Como, L.C.S.W.

Executive Director

Northeast Community Center for Behavioral Health

Roosevelt Blvd & Adams Ave

Philadelphia, PA 19124

Office 215 831-2828

Fax 215 831-2835

Cell 215 450-7036