

**Madison Brame**

From: IRRC
Sent: Thursday, April 10, 2025 3:38 PM
To: Michelle Elliott; Shawn Good; Madison Brame
Cc: Fiona Cormack; Leslie Johnson
Subject: FW: Comment/Question PRTF

Comment on #3417

From: Nate Gressel <ngressel@gjr.org>
Sent: Thursday, April 10, 2025 3:26 PM
To: IRRC <irrc@irrc.state.pa.us>
Subject: Comment/Question PRTF

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Department of Human Services

IRRC Number 3417

Regulation # 14-555 Psychiatric Residential Treatment Facilities

Comment/Question- Throughout the proposed regulations the term "RTF" and "PRTF" are used interchangeably and provides confusion. George Junior Republic in Pennsylvania is one of the few providers that operate "Non-JCAHO RTF Programs", three to be exact. These are not PRTF. Throughout the Regulatory Analysis form the regulations consistently state that "RTF's would be required to go through accreditation" there is not specific language that states Non-JCAHO RTF's would be required to be certified or become PRTF. There is only a reference that RTF's would have to become accredited. George Junior Republic in Pennsylvania is a CARF accredited organization as of January of 2021 and was successfully accredited for the following three years. In 2024, GJR in PA was successfully reaccredited by CARF for an additional three years. This accreditation was not sought to become PRTF but was achieved to be in compliance with the Family First Prevention Act of 2018 when the state was headed towards a QRTP model. My question, is a Non-JCAHO RTF that is accredited forced to become PRTF under these new regulations. If so, the regulations need to reflect this as that is not what they say. If not, the regulations also need to reflect this. Additionally, if Non-JCAHO RTF's that are accredited are required to become PRTF please provide a link, regulation or the like that speaks to this.

Thank you,
Nate

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