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Rush, Jean

From: Kim Love <KLove@invisionhs.org>
Sent: Monday, September 18, 2017 4:54 PM
To: PW, OPCRegs
Subject: Comments on 55 PA Code Chapters 1153 and 5200

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Please accept the following comments on the aforementioned.

5200.22. Staffing Pattern

Because the Proposed Regulations are a welcome regulatory compromise that enhances the CRNP scope of practice while providing the same level of benefits for individuals with multiple insurances, we recommend that they be finalized with some clarification and amplifications that are further described in these Comments.

These Comments focus on one primary point of revision and/or clarification. The definition of the statement "prior written approval of the department" should be revised slightly to define CRNP and Physician agreement to the already enacted "collaboration agreement" as Pennsylvania law currently requires. We would like clarification to ensure there is not an additional approval process within PA Code requiring a second level of Physician/CRNP approval. This will limit the risk of misapplication of the regulatory body in enforcement of interpreted word and provide consistent application with the stated purposes of the Proposed Regulations.

Further, current law is under review in PA to match many other states expansion of the scope of practice for CRNP to provide services under their license without a Physician collaborative agreement. If PA law expands the scope of practice for CRNP's we recommend that PA law take precedent and that regulations adhere to the scope of practice allowed under the law.

We would like more diligence and documentation relating to the requirements of the proposed regulations regarding Telepsychiatry Services. Proposed amendments do not address requirement of services or approval. Therefore, we respectfully request clarification on the issue of requirements and or provisions under sections § 5200.3 "The definition of 'telepsychiatry' is proposed to be added to allow for the utilization of technology to provide clinical services. Telepsychiatry will improve access to mental health care in underserved, rural and remote areas of this Commonwealth, as well as offer specialized clinical services that may only be available in urban regions. According to research reviewed by the American Telemedicine Association, the majority of telemental health services are provided in the outpatient setting. It has been demonstrated that individuals receiving services can be reliably assessed, diagnosed and treated with pharmacology in outpatient clinics through telepsychiatry. Evidence-Based Practice for Telemental Health, July 2009. 103, 141-150, 54A-54AA" Providing such clarification would ensure that use of Telepsych services is regulated and continue to be consistent with what we believe was intended above rather than arbitrary approval or the service.

Thank you

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