

**Madison Brame**

---

**From:** Edward A. Vincent <EVINCENT@devereux.org>  
**Sent:** Friday, November 15, 2024 11:16 AM  
**To:** IRRC  
**Cc:** Jim Sharp  
**Subject:** Comment and Response from Devereux PA Children services center (DPACS)

**CAUTION: \*\*EXTERNAL SENDER\*\*** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The proposed changes would more than double the amount of clinical services required per week. Currently, individuals receive 1 hour of individual therapy and 1 hour of group therapy per week. The new regulations would require 2 hours of individual therapy and 3 hours of group therapy per week. This would require more clinicians to be able to provide these services in an effective and meaningful way. There is also a shortage of therapists not only in PA, but across the country. We are concerned that it would be difficult to have a full clinical staff to meet these increased expectations with these shortages.

The proposed changes would require that a mental health professional be available at the PRTF during “awake hours” each day. While the provision allows for “awake hours” to be determined by the PRTF the identified range is from 7:00am to 9:00pm, depending on the PRTF’s structure. Again, this would stretch the clinical capacity for an already depleted work force and would create a situation where agency would be competing for clinical staff with OP clinics and FB providers who more typically draw clinical staff who can work later hours.

From a hiring prospective the proposed rule will change DSP requirements from a HS diploma and no experience to 1 year of experience. Anything that reduces an applicant pool during a time of staff shortages is very problematic and would likely result in the need for PRTF to decrease total capacity to ensure necessary staffing. The proposed rule also suggests that ratio changes for the PRTF from daytime 1-8 and night time 1-16 to daytime 1-6 and night time 1-12 – again increasing staffing demands.

From a medical standpoint, “proposed rulemaking includes the following minimum treatment requirements: individual therapy with the child’s, youth’s or young adult’s psychiatrist must be provided for at least 1 hour each month.” This would require re-visualizing the Psychiatry job description and caseloads, if they provide therapy as well.

Thanks

Edward A. Vincent, MBA | Program Administrator | Certified Praesidium Guardian™

Devereux Advanced Behavioral Health | Devereux Pennsylvania Children’s Services

390 Boot Road, West Chester, PA 19380

[evincent@devereux.org](mailto:evincent@devereux.org)

Office: 610-431-8188

Cell: 610-637-5705

**Join Devereux Advanced Behavioral Health:** [Devereux career page](#) | [LinkedIn](#) | [Facebook](#) | [YouTube](#)

**Support Devereux Advanced Behavioral Health:** [Donate today!](#)

Join Devereux's [Talent Network!](#)

***Devereux Advanced Behavioral Health – Unlocking Human Potential.***

*Please consider the environment before printing this e-mail.*

*This email (including any attached files) may contain confidential information and/or protected health information (PHI) intended solely for the use of Devereux Advanced Behavioral Health and the recipients named above. If you are not the intended recipient or the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any review, transmission, distribution, printing or copying of this email and/or any attachments is strictly prohibited. If you have received this transmission in error, please immediately notify us by leaving a voice mail at 800-385-6353 and permanently delete this email and any attachments. Unless specifically attributed, the opinions expressed within this email do not necessarily represent the official position of Devereux Advanced Behavioral Health.*