

**Stephen Hoffman**

From: IRRC
Sent: Monday, November 25, 2024 7:52 AM
To: Michelle Elliott; Shawn Good; Stephen Hoffman; Madison Brame
Cc: Fiona Cormack; Leslie Johnson
Subject: FW: Comments on Proposed Regulations (S. 5330) Promulgated by Department of Human Services, Office of Mental Health and Substance Abuse Services

Comment on #3417

From: Blane Dessy <bdessy@gmail.com>
Sent: Saturday, November 23, 2024 3:20 PM
To: IRRC <irrc@irrc.state.pa.us>
Subject: Comments on Proposed Regulations (S. 5330) Promulgated by Department of Human Services, Office of Mental Health and Substance Abuse Services

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.

Ladies and Gentlemen:

My name is Blane Dessy and I am a resident of Erie, PA. I am a member of the Board of Directors for the Sarah A. Reed Children's Center. Our Board of Directors has been apprised of the draft regulations being promulgated by the Office of Mental Health and Substance Abuse Services and I wish to provide comment. I am representing only myself in this communication, but let me convey how troublesome these proposed regulations are.

Apart from the draft regulations themselves, the most troubling issue is that the Office of Mental Health and Substance Abuse Services has not meaningfully engaged with Psychiatric Residential Treatment Facilities (PRTF) since 2020. Over the past four years, we all have witnessed tremendous upheavals in our communities, our organizations' strategic plans, our patient capacity, and our revenue streams. It would have been better if our staff had had more input into the draft regulations.

Specifically, these draft regulations are built upon unrealistic assumptions and a disregard for the fiscal impacts these regulations will have on the Sarah A. Reed Children's Center. The draft regulations are built upon a false assumption of full staffing levels in a time of critical staffing shortages. There is no guarantee that Medical Assistance (M.A.) plans will absorb additional costs as required by these proposed regulations. Finally, PRTFs are in the best position to provide accurate estimates of the cost of these draft regulations.

The unrealistic staffing required in these draft regulations will further strain current staff, particularly psychiatrists, therapists, and registered nurses. Pennsylvania is experiencing a health care crisis due to staff shortages, so regulations that could drive up costs and potentially lead to service disruptions are not what we need now. Ironically, these draft regulations may cause us to lower our bed capacity, complicating an already overtaxed system. While I applaud the desire to provide the best care, these regulations may, in fact, cause the opposite to happen.

Additionally, these draft regulations impose burdensome administrative requirements and unnecessary training requirements where they are not needed.

I am requesting that the draft regulations be withdrawn until there can be sufficient time for adequate and appropriate collaboration between the Commonwealth and the PRTFs. I encourage further engagement between the Office of Mental Health and Substance Abuse Services and local facilities to ensure new regulations that are realistic and that serve the best interests of our clients. Agencies need time to develop realistic fiscal models for regulatory changes and our commitment to excellent patient care must never be jeopardized.

Thank you for the opportunity to comment.

Blane Dessy
Board Member, Sarah A. Reed Children's Center
Erie, Pennsylvania