



Stephen Hoffman

From: Myers, Michele <myersm@csgonline.org>
Sent: Wednesday, November 27, 2024 1:55 PM
To: IRRC
Cc: Heather Bloxham
Subject: PRTF regulations

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Good Afternoon,

Thank you for the opportunity to provide comments on the proposed PRTF regulations submitted on behalf of Community Services Group. The proposed regulations noted below will have a significant financial impact on our small eight bed adolescent program. While we are currently meeting the vast majority of the proposed regulations, the additional staffing requirements and supervision will be costly and not covered by our current per diem reimbursement rate.

While we recognize the needs for increased safety measures at this level of care, we will be required to hire additional qualified staff to meet these requirements, which continues to be a challenge in the current job market.

§1330.32 Conditions of Payment-

(3) The independent team is independent of the psychiatrist who completed the psychiatric evaluation and the PRTF that is being recommended.

Comment: Please clarify this process. Does this apply to initial and continued stay evaluation?

§ 5330.42. Staff requirements-

(c) During the PRTF's awake hours, the following requirements must be met:

(3) A mental health professional shall be present at the PRTF.

Comment: Creates additional staffing costs and will result in need to hire an additional 2-3 MHP qualified staff which are already challenging to hire.

§ 5330.41. Supervision of staff-

(1) A medical director shall provide the following supervision to an RN, clinical director or an APP:

(i) One hour of face-to-face supervision every month.

(ii) Thirty minutes of direct observation of the provision of services every 6 months.

Comment: Medical Director does not serve as a direct staffing supervisor in the program currently, but oversees the delivery of psychiatric services and programming including prescribing and monitoring of psychiatric medication. Will result in additional psychiatry cost to the program not covered by our reimbursement rate.

§ 5330.145. Treatment services-

(c) The following must be provided in accordance with the child's, youth's or young adult treatment objectives:

(1) Individual therapy with the child's, youth's or young adult's treatment team leader must be provided for at least 1 hour each month.

Comment: Language indicates medical director would be providing therapy, however their role is medication management/monitoring and treatment oversight.

§ 5330.14. Reportable incidents-

(c) A PRTF shall complete an incident report through the Department's information management system within 12 hours after the following reportable incidents

are known

to a PRTF:

Comment: Reducing time frame for reporting may limit the program's timeline for a detailed and thorough investigation and debriefing activities.

§ 5330.151. Transportation-

(b) A driver of a vehicle may not be counted towards the supervision ratio requirements specified in subsection (d).

(d) There shall be at least one PRTF staff person present for every three children, youth or young adults being transported.

Comment: Driver not being counted in ratio will require additional staff to be scheduled and result in additional costs. Will also result in need for purchase of additional vehicles to meet 1:3 ratio for transportation.

Thank you for your consideration.

Michele Myers, BS
Co-Director of Children's Services
Children's Quality Assurance/Quality Improvement Team Lead
Community Services Group
1000 Commerce Park Dr., Suite 110
Williamsport, PA 17701
570-323-6944 ext. 20088

myersm@csgonline.org

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