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**Fw: [External] Staffing Qualifications**

From PW, CrisisServicesRegs <RA-PWCRISISSRVSREGS@pa.gov>

Date Tue 10/21/2025 4:29 PM

To PW, CrisisServicesRegs <RA-PWCRISISSRVSREGS@pa.gov>

1 attachment (149 KB)

14-557-01.LETTER.20251021.pdf;

Good afternoon,

Please find the attached response from OMHSAS.

Thank you,

OMHSAS Policy Team.

From: Jim Melvin <Jim.Melvin@mcbhc.org>

Sent: Tuesday, October 21, 2025 2:30 PM

To: PW, CrisisServicesRegs <RA-PWCRISISSRVSREGS@pa.gov>

Cc: Mary Ann Daniels <MaryAnn.Daniels@mcbhc.org>; Tracy Bornick <Tracy.Bornick@mcbhc.org>

Subject: [External] Staffing Qualifications

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Please provide some more clarity on the staffing requirements for Crisis Call Centers.

Section 5260.61 (f) states "A crisis call center shall employ a minimum of one crisis intervention service licensed behavioral health professional per shift".

Section 5260.62 (c) (2) states "Be staffed with crisis intervention behavioral health professionals overseeing responses to crisis events".

Section 5260 (e) states "Crisis call center services shall be provided by crisis intervention service behavioral health professionals and crisis intervention service crisis workers qualified under 5250.31".

For smaller crisis programs from more rural counties this is a significant question because our budget doesn't support hiring licensed staff for all shifts and we believe recruiting licensed staff to work non-traditional shifts will prove extremely challenging. We already have great difficulties filling vacancies due to the current workforce limitations within human services and the general nature/demands of crisis work.

The requirement of having a crisis intervention service behavioral health professional provide the direct and ongoing supervision is reasonable. Having the Call Center work done by crisis intervention service crisis workers is also reasonable but the proposed regulations are not clear that this is the minimal requirement.

Also, our current Crisis model consists of Telephone, Mobile, and Walk-In Crisis. If we establish a Mobile Crisis Team Service model under the new regulations can that service include a telephone component without us also having a Crisis Call Center model? All crisis intervention typically begins with a phone call which permits the team to triage and assess initial needs before initiating a mobile response. Also, even after initiating a mobile response, a crisis worker may utilize phone calls to other involved individuals such as providers, family, police, etc. to gather additional information to complete an accurate risk assessment and safety plan. Can these phone interventions and assessments be included under the Mobile Crisis Team Service license or must we also be licensed as a Crisis Call Center?

Thank you.

James Melvin

Mercer County Behavioral Health Commission