



McDonnell, Kaitlin

From: PW, CrisisServicesRegs
Sent: Thursday, November 6, 2025 10:53 AM
To: Ashley Nichols
Cc: PW, CrisisServicesRegs
Subject: FW: [External] Commentary On Proposed Regulations For MHCI
Attachments: 14-557-05-LETTER.20251106.pdf

Good morning,

Please find the attached response from OMHSAS.

Thank you,

OMHSAS Policy Team.

From: Ashley Nichols <Ashley.Nichols@venangocountypa.gov>
Sent: Wednesday, November 5, 2025 2:10 PM
To: PW, CrisisServicesRegs <RA-PWCRISISSRVSREGS@pa.gov>
Subject: [External] Commentary On Proposed Regulations For MHCI

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

To Whom It May Concern:

I appreciate the opportunity to comment on the proposed regulations. While I support the intent to improve the quality and consistency of services, I am deeply concerned about the practical challenges of implementation in rural and underserved areas of Northwestern Pennsylvania.

Our region continues to face significant workforce shortages across multiple sectors, particularly in behavioral health, direct care, and community-based service delivery. Recruitment and retention have been ongoing challenges, exacerbated by limited training pipelines, wage disparities, and the migration of qualified professionals to urban centers where compensation and resources are more competitive. Without additional investment in workforce development and retention strategies, these regulations may unintentionally widen service gaps.

In addition, the barriers to service delivery in rural communities—such as long travel distances, limited public transportation, and a smaller provider network—could compound the difficulties of meeting new regulatory requirements. Providers in Northwestern Pennsylvania already operate with lean staffing models and must often cover expansive geographic areas to ensure individuals receive timely support.

Finally, the costs associated with compliance present a substantial burden for rural providers. Many organizations function with limited administrative capacity and depend on grant funding or capped

reimbursements that do not reflect rising operational expenses. Implementing new requirements without corresponding financial support could reduce service availability or force providers to make untenable tradeoffs between compliance and direct care.

I respectfully urge the Department to consider regional flexibility, phased implementation timelines, and supplemental funding or technical assistance for rural and underserved areas. This would help ensure that the intended outcomes of the regulations—enhanced quality and equity—can be achieved without jeopardizing access to critical services in communities like ours.

Thank you for your consideration and for your continued attention to the realities faced by providers and residents in Northwestern Pennsylvania.

Sincerely,

Ashley Nichols-Kaye MS, MHP, CHCO, NCG

Ashley Nichols-Kaye MS, MHP, CHCO, NCG

Venango County HS QM/HIPAA Compliance

1 Dale Avenue

Franklin, PA 16323

Office: 814-432-9126

Cell: 814-493-7536

Please note our emails have changed. My updated email is: Ashley.Nichols@venangocountypa.gov

This electronic message and its attachments may include information from Venango County that is confidential and may be protected under Federal and/or State law. This information is intended to be for the use of the intended addressee only. The improper use of this information is prohibited. If you have received this email in error, please notify us by telephone at (814) 432-9126 immediately or by email Ashley.Nichols@venangocountypa.gov so that we may arrange for the appropriate retrieval of this document at no cost to you.

WARNING: CONFIDENTIALITY NOTICE This electronic message and its attachments may include information from Venango County that is confidential and may be protected under Federal and/or State

law. This information is intended to be for the use of the intended addressee only. The improper use of this information is prohibited. If you have received this e-mail in error, please notify us by telephone at (814) 432-9126 immediately or by e-mail at Ashley.Nichols@venangocountypa.gov so that we may arrange for the appropriate retrieval of this document at no cost to you.