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May 29, 2018

Office of Mental Health and Substance Abuse Services  
Bureau of Policy, Planning and Program Development  
P.O. Box 2675  
Harrisburg, PA 17105

RE: Comment of the PA Coalition of Nurse Practitioners  
Draft OMHSAS Guidelines for the Provision of Tele-Behavioral  
Health Services

To Whom It May Concern:

Thank you for the opportunity to provide comment to the Pennsylvania Department of Human Services, Office of Mental Health and Substance Abuse Services Bulletin, related to the Draft OMHSAS Guidelines for the Provision of Tele-Behavioral Health Services.

The Pennsylvania Coalition of Nurse Practitioners (PCNP) is a state organization that promotes and protects the practice of over 11,000 certified registered nurse practitioners (CRNPs) in the Commonwealth of Pennsylvania. As the Bulletin applies to Certified Registered Nurse Practitioners, among others, the PCNP is pleased to offer comment on the subject of tele-behavioral health services.

PCNP provides comment in the following areas:

**A. Practitioner Requirements: Page 3, Number 1**

Number 1 of Practitioner Requirements provides for a psychiatrist in a neighboring state to provide services in Pennsylvania by maintaining a reciprocal licensure as an “extraterritorial.” It is recommended that a nurse practitioner from a neighboring state should also be required to follow the requirements under The Professional Nursing Law<sup>1</sup> for providing tele-behavioral health services in the Commonwealth of Pennsylvania by obtaining a temporary practice permit or by licensure. This is also referenced indirectly under number 3 of Practitioner Requirements.

<sup>1</sup> Act of May 22, 1951, P.L. 317, No. 69, as amended, 63 P.S. §§ 211-225.5.

**B. Quality of Care: Page 4, Number 2**

The draft bulletin provides that quality of care is being measured by the Behavioral Health Managed Care Organizations, i.e., insurance companies. It is recommended that the entity measuring the quality of care should be an independent third party, such as by the OMHSAS, so that there is no conflict with the entity measuring the quality of care and the entity providing the payment for services. It is recommended that standards be developed by which all quality of care is measured and monitored.

The PCNP appreciates the opportunity to comment on the Draft OMHSAS Guidelines for the Provision of Tele-Behavioral Health Services. Should you have any questions, please do not hesitate to contact me at 215-896-3846, ext. 702 or by email at [maria@rckelly.com](mailto:maria@rckelly.com)

Very respectfully,



Maria Battista, J.D., Ed.D.  
Director of Policy and Government Affairs  
PA Coalition of Nurse Practitioners