



Governor's Advisory Council for Exceptional Citizens (GACEC) 516 West Loockerman St., Dover, DE 19904
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October 31, 2022

Meredith Seitz
Department of Services for Children, Youth and their Families
1825 Faulkland Rd.
Wilmington, DE 19805

RE: 26 DE Reg. 305 [DPBHS Proposed Qualifications for Juvenile Mental Health Screeners Regulation (October 1, 2022)]

Dear Ms. Seitz:

The Governor's Advisory Council for Exceptional Citizens (GACEC) has reviewed the Division of Prevention and Behavioral Health (DPBHS) regulations, which will allow additional professionals to be eligible to become credentialed juvenile mental health screeners. Council **supports** the proposed changes to the regulations as they may streamline access to crisis care when children experiencing psychiatric emergencies have a parent or guardian who may be unwilling to authorize care or cannot be immediately located. As an advisory Council dedicated to safeguarding the health and well-being of Delaware citizens with exceptionalities, we understand the risk involved in not streamlining the process of emergency detention for children and youth in crisis. However, members of Council hope that DPBHS will monitor this amended process to ensure the number of children and youth involuntarily hospitalized is not increased due to expansion of individuals authorized to make life-altering decisions.

The expansion of eligibility to include non-licensed mental health professionals working under the supervision of a psychiatrist is consistent with the underlying statute, which already allows for individuals in this category to be credentialed as mental health screeners. From a practical standpoint, it makes sense for individuals employed by the DPBHS Mobile Response and Stabilization Services (MRSS) provider to have the credentials to initiate emergency detention without needing to subject a child in crisis to the delay that may be required in locating a credentialed juvenile mental health screener to initiate the process. Similarly, allowing more emergency department and medical hospital staff to serve as credentialed mental health screeners could potentially help to minimize the time a youth in crisis spends in an emergency room waiting for a transfer to a more therapeutic environment.

Thank you for your time and consideration of our support and comments. Please feel free to contact Pam Weir or me should you have any questions on our comments or request.

Sincerely,

Ann C Fisher

Ann C. Fisher
Chairperson

ACF: kpc