

July 16, 2007

Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Chairman Coccodrilli,

The National Association of Social Workers, Pennsylvania Chapter (NASW-PA) is commenting on final-form regulation #125-54, the Pennsylvania Gaming Control Board regulations addressing Compulsive and Problem Gambling; Self-Exclusion, being considered by IRRC on July 19, 2007. NASW-PA is a membership organization representing 6,100 social workers throughout the Commonwealth.

The final-form regulations did not address NASW PA's concerns, submitted under proposed rulemaking, with regard to the definition of qualified treatment professional. The definition remains unclear on educational and/or treatment experience necessary to attain this designation. The regulations also do not address who determines individuals designated as qualified treatment professionals.

In the preamble, NASW PA recognizes the Gaming Control Board has explained why more specific requirements were not delineated in the definition of "qualified treatment professional". NASW PA appreciates these efforts and encourages the Board to adopt standards or minimum requirements for qualified treatment professionals. NASW-PA would suggest qualified treatment professionals be licensed mental health or addiction providers and hold the National Certified Gambling Counselor, Level I (NCGC-1) designation, at minimum.

Further, by outlining the requirements of who qualifies as a treatment professional, slot machine licenses will be able to identify these providers for their compulsive and problem gambling plan.

Thank you for your time and attention to this request.

Sincerely,

Jenna Mehnert, MSW, Executive Director
NASW-PA

Cc: Richard Sandusky, Director of Regulatory Review
Kim Kaufman, Executive Director, IRRC