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Nadine Bean PhD, MSSA  
*President*

Jenna Mehnert, MSW  
*Executive Director*

March 7, 2007

Paul Resch, Secretary  
Pennsylvania Gaming Control Board  
P.O. Box 69060  
Harrisburg, PA 17106-9060

Dear Mr. Resch,

The National Association of Social Workers, Pennsylvania Chapter (NASW-PA) is commenting on Regulation #125-54, the Pennsylvania Gaming Control Board regulations addressing Compulsive and Problem Gambling; Self-Exclusion, currently before IRRC under proposed rulemaking. NASW-PA is a membership organization representing 6,100 social workers throughout the Commonwealth.

NASW-PA works to enhance the delivery of quality services to client populations, to create and maintain professional social work standards, and to advance sound social policies. Our concern with Regulation #125-54 is the definition of qualified treatment professional. The definition lacks clarity with regard to educational and/or treatment experience necessary to attain this designation. The regulations also do not address who determines individuals designated as qualified treatment professionals.

As referenced above, NASW-PA advocates for sound social policy, specifically to benefit the populations served by social workers. NASW-PA is concerned about the quality of the treatment provided by "qualified treatment professionals" under the regulation. NASW-PA is troubled as the regulations require applicants for slot machine licenses to submit a compulsive and problem gambling plan, including procedures for referral of suspected or known compulsive and problem gamblers to "qualified treatment professionals". According to our interpretation of the regulations, the slot machine license applicants identify "qualified treatment professionals" and the Gaming Control Board approves their list of professionals.

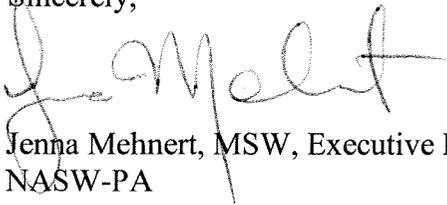
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NASW-PA encourages the Pennsylvania Gaming Control Board to assign additional requirements to identify "qualified treatment professionals". Specifically, NASW-PA requests IRRC to consider qualified treatment professionals as those licensed by the PA Department of State to provide mental health and behavioral health services for purposes of defining the regulation. If truly effective services are to be provided to those individuals with gambling addictions, services must be provided by professionals educated and trained to provide effective services.

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, IRRC  
Michelle Afragola, Deputy Director of Regulatory Review, IRRC