

August 16, 2007

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

Dear Chairman Coccodrilli,

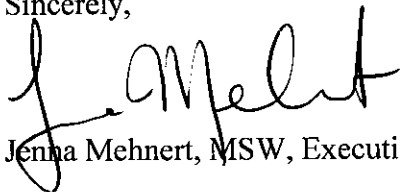
The National Association of Social Workers, Pennsylvania Chapter (NASW-PA) is offering comments on final-form regulation #125-54, the Pennsylvania Gaming Control Board regulations addressing Compulsive and Problem Gambling; Self-Exclusion, being considered by IRRC on September 20, 2007. NASW-PA is a membership organization representing approximately 6,100 social workers throughout the Commonwealth.

The regulations as resubmitted deleted all references to “qualified treatment professional”. The regulations require the compulsive and problem gambling plan to include “community, public and private treatment services, gamblers anonymous programs and similar treatment or addiction therapy programs designed to prevent, treat, or monitor compulsive and problem gamblers and to counsel family members.”

NASW-PA is concerned about problem gamblers being referred by those with slot machine licenses to addiction services. All addiction treatment services are not equal in their quality. There is no mention in the regulation of what qualifies services to be placed on the list by slot machine licenses. NASW-PA understands the PA Gaming Control Board is working with the Department of Health to determine who is qualified to treat those with gaming addictions. We would encourage these agencies to consider the recommendation that the providers be licensed mental health or addiction providers and hold the National Certified Gambling Counselor, Level I (NCGC-1) designation, at minimum.

Thank you for your time and attention to this request.

Sincerely,



Jenna Mehnert, MSW, Executive Director

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