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**To:** [HRSA Paperwork](#)  
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Information Collection Request Title: Health Resources and Services Administration (HRSA) Uniform Data System (UDS), OMB No. 0915-0193—Revision  
Specification of Advanced Practice Psychiatric Providers in Table 5 of UDS

Currently Table 5 of the UDS report puts Psychiatric Mental Health Nurse Practitioners (PMHNPs) in the “Other” Category. While lines 9a-10 specify NPs and PAs in medical care, in the mental health services staffing as recorded (lines 20a-20c), there is no designation for PMHNPs. They are grouped together with other licensed mental health providers (line 20b) which includes psychiatric social workers, PAs, family therapists, and other licensed master’s degree-prepared providers.

In the 2023 USD Report this line of staff (20b-other) performed nearly five times the clinic visits delivered by psychiatrists- and twice the number of virtual visits. Note recent reports indicate 43,000 certified PMHNPs (who have prescriptive privileges in 50 states). Because of this recording convention there is no sense of how many PMHNPs are providing services, the type of patients seen or the quality of care they are providing. It also limits recognition of the work of PAs, psychiatric social workers and counselors. The failure to account for these personnel creates also difficulties in creating a staff projection model, understanding workloads, and insights into how integrated and team services operate and their outcomes. It also mixes together professionals who serve very different functions.

There are also changes to Table 5 for 2023 that now account for the mental health care delivered by Primary Care Staff. The table (Selected Service Detail Addendum) Psychiatrists appear now in a second category on substance use but there is no mention of PMHNPs who have demonstrated their capabilities to increase the capacity of Medication Assisted Therapy (MAT) Providers. They are now in line 21h with other licensed providers.

In summary, the UDS system is an important source of data for monitoring care delivered in HRSA funded health centers. It is possible to amend and add details to Table 5. It was done this year for pharmacists- delineating four categories of these providers. The lack of detail in UDS Table 5 and the confusing designations in Substance Use Detail is a barrier to documenting who is delivering mental health/SU care in health centers, to what patients, and with what outcomes.

Recommendations: In Table 5 Specify PMHNPs and in Table 5-Selected Service Detail Addendum add PMHNPs as separate categories of providers.

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