

From: [Kathleen Delaney](#)
To: [HRSA Paperwork](#)
Subject: [EXTERNAL] Health Resources and Services Administration (HRSA) Uniform Data System (UDS), OMB No. 0915-0193 – Revision
Date: Saturday, December 20, 2025 11:48:16 AM
Attachments: [image.png](#)

Subject: In Table 5 of UDS specify Psychiatric Mental Health Nurse Practitioners as a separate categories of providers in the mental health services section.

In September I posted the following comment (01632542).

Currently Table 5 of the UDS report puts Psychiatric Mental Health Nurse Practitioners (PMHNPs) in the “Other” Category. While lines 9a-10 of Table 5 specify NPs and PAs in medical care, in 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 include psychiatric social workers, PAs, family therapists, and other licensed master’s degree–prepared providers. Recommendations: Specify PMHNPs in Table 5 as separate category of providers

I received a response that you had recorded my comments. Thank you

However, as I review the proposed changes to UDS for Calendar Year 2026 there is no mention of changes to Line 20b to consider specification of Psychiatric Mental Health Nurse Practitioners. Please consider the significant services the practitioners in this category provide. In the 2024 UDS Report, this line of staff (20b-other) performed nearly four times the clinic visits delivered by psychiatrists- and three times the number of virtual visits. In fact, the 2024 data indicate this group of providers delivered the most clinic visits (4,370,860) and virtual visits (2,715,191) of any other provider group in the mental health section. The failure to account for these providers poses 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.

Note there are 52,176 certified PMHNPs (who have prescriptive privileges in 50 states). Because of the recording convention in Table 5, 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 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 last year for pharmacists- delineating four categories of these providers. The lack of detail in UDS Table 5 is a barrier to documenting who is delivering mental health/SU care

in health centers, to what patients, and with what outcomes.

A handwritten signature in cursive script, appearing to read "Kathleen R. Delaney".

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