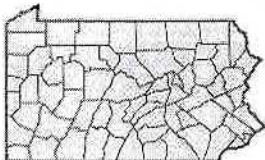


# Pennsylvania Children and Youth Administrators, Inc.



17 North Front Street - Harrisburg, PA 17101-1624  
(717) 232-7554 - Fax (717) 232-2162

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AUG 7 2006

Human Services Licensing Management  
and Research

Mr. Robert Robinson, Director  
Human Services Licensing Management and Research  
Box 2675  
Health and Welfare Building  
Harrisburg, PA 17105

August 4, 2006

Re: Regulation No. 14-504

Dear Mr. Robinson,

The Pennsylvania Children and Youth Administrators Association (PCYA), an affiliate of the County Commissioners Association of Pennsylvania (CCAP), wishes to address those portions of the Proposed Rulemaking that pertain to Chapters 3130, 3140, 3270, 3280 3680 and 3700.

While we appreciate the standardization of similar processes, provided that the results are an improvement over the status quo, we do have the following concerns:

- for those agencies and providers already under GRAPP, how does the responsiveness to appeals compare to that of agencies and providers not under GRAPP?
- the timelines for both submission and action on appeals are not clear and we fear that this will lead to delays in resolution of disputes, "justice delayed is justice denied" as it were; e.g.: Reducing the time period from 30 days to 10 days creates problems for the Agencies who may need to review and interpret determinations and prepare the Appeal; The Bureau of Hearings and Appeals (BHA) has an indefinite period to schedule the hearing- It should be scheduled within 60 days; BHA has an indefinite period to make its decision. Decisions should be within 30 days of the hearing.
- The proposed changes do not address a primary need of Counties for clarification of how and when County Children and Youth Services Agencies should appeal adverse decisions on Needs-based Plan and Budget by the DPW (3140.17);
- There are nearly 100 pages in 1 Pa. Code Part II (relating to GRAPP) and another nearly 200 pages in 2 Pa. C.S.A. sec. 501-508 and 701-704 (relating to Administrative Agency Law); training will be required for county agency staff, attorneys and others; when, where and by whom will this training be provided?

If you have questions regarding the above comments and concerns, please feel free to contact me at the address above, at 717-232-7554 or by email at [csonger@pacounties.org](mailto:csonger@pacounties.org) . Thank you for the opportunity to comment.

Sincerely,

Charles R. Songer Jr.  
Executive Director

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**Robinson, Robert E (PW/AD)**

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**From:** Chuck Songer [csonger@pacounties.org]  
**Sent:** Friday, August 04, 2006 12:41 PM  
**To:** Robert Robinson  
**Cc:** Barbara Robbins  
**Subject:** Regulation No. 14-504

Attached are our comments regarding the Proposed Rulemaking (Regulation No. 14-504).  
If you have questions, please feel free to contact me as noted below at you convenience.

Chuck

*Charles R. Songer Jr., Executive Director  
Pa. Children & Youth Administrators Association  
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Harrisburg, PA 17101  
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