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PW, ODP Regs Comments

From: Jill Rogers [Jill.Rogers@jevs.org]
Sent: Friday, May 23, 2008 4:41 PM
To: ra-odpregscomments@state.pa.us
Cc: Clara Thompson; Pamela Kalay
Subject: Proposed Rulemaking re ISP's - Comments Due by 5/27

INDEPENDENT REGULATORY
REVIEW COMMISSION

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Hello Ms. Wendy Dixon

In review of the proposed rulemaking regarding ISPs, I agree with the concept of one document, and am pleased that this issue is being addressed.

There are two areas which I believe need to be reviewed more closely:

1. Distribution of assessment data to be used during planning meetings to all planning team members no later than 30 days before the meeting: While we want to keep family members and all team members well-informed, 30 days notice is too lengthy. This could affect the efficiency of moving dates, misplaced paperwork by team members and delay in needed changes for someone in the new fee-for-service world. I recommend sending the reports 15 days in advance.
2. Providers will be required to distribute copies of their assessment information and 3 month review summary to individuals and families within 30 days of the meeting. A person may have two providers (one for residential services and one for day services). Thereby, this process will mandate additional copies from two sources, which will have a fiscal impact on the provider agencies, requiring additional copies of the reports, mailing fees and possibly duplication of team meetings. I recommend that a standard report be utilized just as the IP. Another suggestion is that when two providers are involved, the residential provider takes the lead role for this assignment.

Thank you for the opportunity of providing feedback.

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