

# 2687

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**PW, ODP Regs Comments**

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**From:** Tim Wilson [tim@philalliance.net]  
**Sent:** Wednesday, May 28, 2008 3:06 PM  
**To:** ra-odpregscomments@state.pa.us  
**Subject:** Re: Proposed Rulemaking re ISP's

2008 JUN -2 PM 3: 11

INDEPENDENT REGULATORY  
REVIEW COMMISSION

ODP,

Please accept this brief commentary on the proposed rulemaking regarding changes in the procedures for ISP's, which will now be called IP's, in the PA Bulletin.

I am disappointed that there was not any announcement from ODP or encouragement of discussion and comment on this rule-making, other than the fact that it came out in the PA Bulletin. Typically, discussion among an inclusive collection of stakeholders will result in a better product for all concerned. Any rule is relevant for all stakeholders, not just the ones who are directly creating a product.

There was not much time to gather input and have related discussions re the proposed rule-making on ISP's.

One substantial comment that needs to be raised is:

\* re the requirement to **submit all Team Planning documents, such as assessments, etc. to the family 30 days before the Team Meeting.**

While we certainly agree that families should be well-informed, it seems that few people read anything 30 days ahead of time; **[we recommend 15 days]** and when we build in these kinds of lags, that's why it takes so long to plan movements and any other changes for an individual, which inevitably will mean greater costs for the providers and unnecessary delay for everyone.

Thank you for your consideration. Tim Wilson

**ADDRESS & PHONE**

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