

Cooper, Kathy

From: Smith, James M.
Sent: Friday, November 19, 2010 1:58 PM
To: IRRC
Subject: FW: Regulation #14-522; IRRC #2878

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#2878

From: Sheila Fabrizio [mailto:SFabrizio@FISHMANTOBIN.com]
Sent: Friday, November 19, 2010 1:48 PM
To: ra-rtfcomments@state.pa.us
Cc: Smith, James M.
Subject: Regulation #14-522; IRRC #2878

I am very please with many provisions of the draft regulations. Specifically, I am pleased with the provision to limit the size of RTF's to a maximum of 48. I am also pleased that the equivalent of a family advocate would be available.

Some concerns:

I believe strongly that the child's specific form of communication be used. Staff working with the child must also be trained in the communication method or knowledgeable staff should be assigned that are already familiar with the mode of communication being used the child.

Regarding 23.223(g): I feel the regulation should provide that is a parent disagrees with the ISP; the written statement from the parent should be attached and made part of the ISP. The ISP should indicate that a statement from the parent is attached to the document. Additionally, the regulations should specify what steps are to be taken and a timeline and action plan developed to address how the disagreement is being resolved.

Thank you.