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**Cooper, Kathy**

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**From:** Miller, Sarah E.  
**Sent:** Monday, November 22, 2010 3:00 PM  
**To:** IRRC  
**Subject:** Fw: IRRC Website - New Message

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Comments for res treatment facilities.

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**From:** Independent Regulatory Review Commission [mailto:No-Reply@irrc.state.pa.us]  
**Sent:** Monday, November 22, 2010 02:52 PM  
**To:** Help  
**Subject:** IRRC Website - New Message



**IRRC**

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**Independent Regulatory Review Commission**

A new message has arrived from the IRRC Website

**First Name:** Pamela

**Last Name:** Wilshere

**Company:** CBHNP

**Email:** [pwilshere@cbhnp.org](mailto:pwilshere@cbhnp.org)

**Subject:** comments on RTF regulations

**Message:**

November 22, 2010 To Whom It May Concern: Please accept our comments below to the proposed Residential Treatment Regulations. We have limited our comments to areas needing additional clarification. 1. The 3800's indicate the Director can work more than 1 facility. This language was removed. Please clarify ability of RTF director to run more than one facility. 2. 23.201 (b) This indicates that Time Out is considered a restrictive procedure. In section (c) just below it states "the only restrictive procedures permitted in an RTF are drugs used as a restraint and manual restraints" and section 23:204 lists Time Out as an entire section which appears to be able to be used in the RTF. Please clarify. 3. 23.201 (c) ..drugs used as a restraint are permitted in the RTF. If the child objects to the drug then they need to be assessed for MH IP. This reads like the RTF can deliver PRN and other chemical restraints to children or send the child to MH IP. This is viewed as a change from the previous regulations. Please clarify. 4. 23.222 (a) Interview before admission. Does this mean the provider cannot make a decision solely from the packet submitted for MNC? We are concerned that this may delay treatment. 5. 23.222 (d) readmission within 5 days – what role will the MCO play in making this determination. Please clarify. Thank you for the opportunity to comment. Pamela Wilshere, LCSW, MBA QI Project Manager CBHNP