

Erhard, E. Shaye

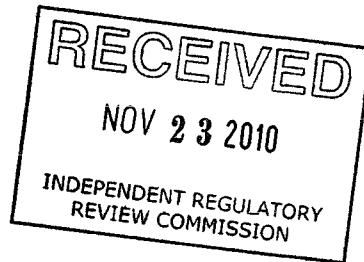
From: Alex Knapp [alexknapp.08@gmail.com]
Sent: Friday, November 19, 2010 6:02 PM
To: PW, RTFComments
Cc: jsmith@irrc.state.pa.us
Subject: Reference: Regulation #14-522; IRRC # 2878

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Ms. Shaye Erhard
 DPW/OMHSAS
 233 Beechmont Building
 DGS Annex Complex
 PO Box 2675
 Harrisburg, PA 17105-2675

BUREAU OF CHILDREN'S SERVICES



November 19, 2010

Dear Ms. Erhard:

My name is Alex C. Knapp. I am a transition-age youth consumer and advocate. I have been involved with the Office of Mental Health and Substance Abuse Services' Transition-age Youth Subcommittee since May of 2007. I have experienced the effects of the current regulations *55 PA Code Chapter 23, Residential Treatment Facilities*. I represent a voice which is often times brushed under the rug and not taken under consideration. I represent the voice of experience as a youth.

There is no question that regulations *55 PA Code Chapter 23, Residential Treatment Facilities* are necessary regulations. They continue to mandate a safe and therapeutically encouraging environment for all youth in residential treatment facilities across the commonwealth. As a previous RTF resident, I can attest to both the benefits and sometimes detrimental experiences that these facilities create and provide.

I have reviewed the proposed new regulations and find myself in awe of many of the proposed changes. Specifically I draw attention §23.14 – Maximum Capacity. The proposed regulations put a limit of 48 beds per facility. This change would only have positive effects on the youth of facilities. , in addition to many other positive benefits, this would allow for more time with therapists, a safer living environment, and better living arrangements all together.

I'd also like to make a point in referencing §23.20 – Restrictive Procedures. The proposed regulations show the DPW's continued support to eliminate and minimize the use of restraints. While I acknowledge, that at times these physically restrictive techniques are necessary, the use of de-escalation tactics continues to shrink the amount of incidents which result in restraint. I applaud the recommended regulations in their support for implication of alternatives and avoidance approach to the use of restraints.

While these proposed regulations demonstrate steps in the right direction towards total mental wellness for all children and youth in residential treatment facilities, there are still more that must be taken. In §23.17 (i) and (k), it is imperative that the child be given the option of involvement when notifying their parent(s) of any restrictive procedure. I understand that in some occurrences it may not be in the best interest of the child to take part, however as a prior resident of a facility, I will attest that it only upsets a child more, when they are told that facility staff were the first to tell their parents of what occurred. This also gives parents an opportunity to discuss what happened and make sure that the child is truly okay.

In addition, I implore you to make the language of §23.32 (a) and (o) inclusive to gender identity. The recent epidemic of lesbian, gay, transgender and bi-sexual youth suicides, demonstrates just how easily impacted these

fragile youth are. By not allowing youth who identify as a different gender than their biological make-up to express themselves, we are telling them they are wrong and only reinforcing the bullying they face every day of their lives. We must make a stand, if we truly want all youth of this commonwealth to experience true, total mental wellness.

As a previous resident, I must also draw attention to the proposed §23.61(a) the idea of 15 minute checks is frightening to me, especially in non-single rooms. A lot, I reiterate, A LOT can happen in 15 minutes, from physical to sexual to verbal abuse, 15 minutes is too long. I recommend a time of 7 minutes to ensure maximum safety for all residents. That being stated, I also acknowledge that at times close to discharge, residents may be given opportunity to participate in employment or other community based programs. This regulation should be amended to make this possible, when deemed therapeutically necessary and acceptable.

This timing regulation must also bbe designed to allow for the least restrictive environment when dealing with a child's educational needs. Many times, children are put in on-site educational facilities, even though that facility may not provide the necessary and wanted education. Children must be permitted to learn where they will best flourish and grow. This guideline, of least restrictive educational environment must be included with §23.221.

Thank-you for this chance to express the youth voice in regards to proposed *55 PA Code Chapter 23*. Again, I applaud DPW for the many of the changes these proposed regulations offer and hope that with some tweaking, when implemented, these regulations will guarantee total mental wellness for the young people of Pennsylvania.

Sincerely,
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Transition-age youth
Mental Health Consumer
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