14-522-28

Erhard, E. Shaye

From:

Allen, Deborah [dallen@cabhc.org]

Sent:

Monday, November 22, 2010 2:53 PM

To: Cc: Mrozowski, Stanley Erhard, E. Shaye

Subject:

Draft RTF Reg Comments

Attachments:

RTF.DOC

RECEIVED

NOV 2 2 2010

Please find our comments attached for the RTF draft regs. Thank you.

EUTEAU OF CHILDREN'S SERVICES

Deborah S. Allen, Clinical Director Capital Area Behavioral Health Collaborative 2300 Vartan Way, Suite 206 Harrisburg, PA 17110 717.671.7190 (fax) 717.671.7289 dallen@cabhc.org



Notice: This document may contain confidential or proprietary information intended for a specific individual(s) and purpose. Any inappropriate use, distribution, or copying is strictly prohibited. If received in error, notify sender and immediately delete the message.

NOTICE: This document may contain confidential or proprietary information intended for a specific individual(s) and purpose. Any inappropriate use, distribution, or copying is strictly prohibited. If received in error, notify sender and immediately delete the message.

2878

CAPITAL AREA BEHAVIORAL HEALTH COLLABORATIVE, INC. Established October 1999



INDEPENDENT REGULATORY REVIEW COMMISSION

Below are CABHC's comments to the draft RTF Regulations.

Comments

Section 23.62, Training: Please explain the length of training for staff.

Section 23.143, Urine Screening: This process needs to be explained more. When does this occur? Is the Member screened upon entry into the RTF? Is this done periodically through the Member's treatment? How is this observed? Is the test random?

Section 23.224, Focused Goals: Goals need to be reasonable and individualized.

Section 23.230, Discharge: There needs to be more follow-up support at discharge. Section 23.41-23.44, Family Involvement: RTFs are to support family involvement, will schedule visits and arrange for travel. What are the expectations on RTF providers? Will they pay for transportation for family visits? Will they provide the transportation? What occurs if the family is unwilling to attend family sessions?