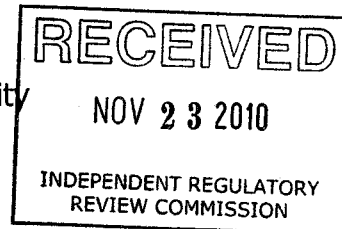


Comment on Proposed Regulations--Residential Treatment Facility  
10-27-10



**23.41 Family participation in the treatment process.**

We suggest the addition of language specifying in 23.41 (3) that the "Demonstrated opportunities for frequent and regular family contact...." that these are clearly documented in the Child's RTF record.

**23.54 (c) (2) Medical Director**

We suggest a change to "... but not less frequently than every 15 to 18 days by the Medical Director or a Psychiatrist or collaborating CRNP working under the direction of the Medical Director."

Many negative effects of psychotropic medication in children can manifest in short periods of time and need to be addressed immediately and aggressively by the prescribing professional and/or his collaborating CRNP or other psychiatrist. Thirty days represents too great a period to chance that these effects might go unnoticed.

**23.54 (c) (6)**

We suggest the addition of "an initial psychiatric evaluation within 15 days of RTF admission or addendum to a psychiatric evaluation completed within 30 days prior to admission."

This will assure that the child and has his/her medications, if any, reviewed along with the establishment of an introductory treatment plan by the Medical Director within 15 days of his/her admission to the facility.

We also suggest the addition of "The Medical Director, another Psychiatrist, or his collaborating CRNP shall complete a Discharge Summary of the success and efficacy of the child's Treatment Plan during the course of his residence in the RTF.

**23.55 Clinical Director**

We suggest the addition of "The Clinical Director shall document his/her review of each child's Treatment Plan within 15 days of its initiation and provides any necessary training to staff to assure competent and safe delivery of the services described in each plan."

**23.183 (e) Use of prescription medications**

We suggest the change to "....every 15 days..."

**23.204 (d) Time out**

We suggest the addition of Staff shall "directly and continuously" monitor...."

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14-522-18

**From:** LWertz@PMHCC.ORG  
**Sent:** Monday, November 22, 2010 11:07 AM  
**To:** PW, RTFComments  
**Cc:** IRRCC@IRRC.state.pa.us  
**Subject:** Comments from Family Training and Advocacy Center on Residential Treatment Facility Proposed Regulations  
**Attachments:** FINAL Comment on Proposed Residential Treatment Facility Regulations 11-10.doc

Attached please find the comments we wish to offer regarding the proposed Residential Training Facility Regulations under review by the IRRCC.

Thank you for this opportunity to offer these for the Commission's consideration.

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