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From: Brecia Nevada [bnevada@hoffmanhomes.com]
Sent: Monday, November 22, 2010 10:44 AM
To: PW, RTFComments
Subject: Proposed RTF Regulations Feedback
Attachments: Proposed RTF Regulations Comments.doc

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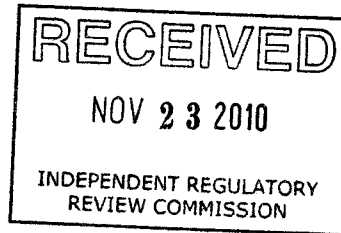
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To whom it may concern:

BUREAU OF CHILDREN'S SERVICES

Please review the attached feedback in response to the newly Proposed RTF regulations. Thank you for your consideration.

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Thank you.

RTF New Proposed Regulation Comments:

1. Make sure all new costs are properly coded for MA reimbursement.
2. With the reduction in RTF beds, will more children who meet MNC for RTF be placed out of state? What impact will this have on Family Work/Reunification efforts?
3. How do these regulations compare with other states? With fewer beds will PA children be safe in out of state programs that do not meet these regulations?
4. Shorter length of per child stay would not reduce the over per year cost for 48 beds. Each bed is per 365 days no matter which child is using the bed.
5. What is the reference base for rate setting since there are no programs with these requirements to compare to.
6. Are Community Based resources readily available to meet the increase in demand that will be created by the reduction in RTF beds.
7. Are rate increases guaranteed since per diem is negotiated with MCOs not with MA directly.
8. Standards need to be reflected in rate. RTF requirements will be more strict than Acute Inpatient.
9. Psychiatrist time is currently limited based on supply and demand.
10. Lack of LCSWs in the field to fill Clinical Director positions.
11. Weekend and evening requirements for Master's and Licensed professionals will be difficult to fill.
12. Significant pay increase will be needed to attract qualified Mental Health Workers and Aides.
13. There should be reimbursement for Therapeutic Leaves as part of Family Therapy Treatment.
14. RTFs should not be held accountable for the effectiveness of service delivery post discharge.
15. What state standards for salaries will RTF wages be based on since the state does not employ professionals in RTF settings?