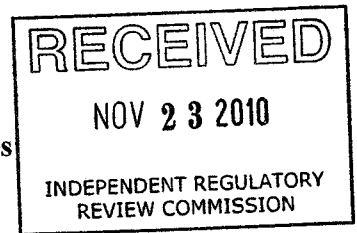


PATH (People Acting to Help) Inc.
Comments re: Chapter 23, Residential Treatment Facilities
No. 14 - 522



General Comments

We are concerned that the decision to exempt CRR's from the 3800 regulations would not benefit children/youth served in a CRR as the 3800 regulations are more inclusive and provide additional guidance to providers serving children/youth in a residential setting.

The proposed regulations state that a smaller 8 bed non-accredited RTF, not located on a larger campus, will be given the option to become licensed as a CRR group home. We request additional information related to "not located on a larger campus". For example, we are a community provider, leasing a residential home that is located on a hospital campus. The RTF has no affiliation with the hospital. Therefore, we assume that this home will be eligible for licensure as a CRR.

23.55 Clinical Director

The regulation states that the Clinical Director shall be a licensed psychologist, licensed clinical social worker or a licensed marriage and family therapist with at least 2 years experience. There are many qualified licensed professional counselors (LPC) that could perform the Clinical Director responsibilities; we recommend that licensed professional counselors be added to the array of acceptable qualifications for Clinical Director.

23.56 Mental Health Professional

The regulation (23.56 (a) (3)) states that the Mental Health Professional is responsible for the supervision of Mental Health Workers. Clarification is requested regarding who may provide clinical supervision for Mental Health Professionals and if a Mental Health Professional is permitted to provide supervision for other Mental Health Professionals.

23.58 Staff Ratios

The proposed regulation (b.1) states that there be at least one Mental Health Professional either onsite or available by telephone when a child is at the RTF. The proposed regulation (b.4) further states that whenever 6 or more children are present at the RTF, there shall be at least one mental health professional for every 6 children present at the RTF during awake hours. Clarification is requested as to whether the Mental Health Professional(s) needs to be present at the site, or can the Mental Health Professional(s) be available by phone.

23.60 Family Advocacy

The proposed regulation does not address the qualifications for the Family Advocate position. We recommend that clarification occur regarding the qualifications for this position.

23.307 General Payment Policy

Under subsection C, Roman numeral 5 (v) the proposed regulation states that payment will not be made to an RTF for therapeutic leaves. Historically, an RTF has been able to receive payment for up to 48 days per calendar year for approved therapeutic leaves. Therapeutic leaves are an integral part of the treatment provided in an RTF. Therapeutic leaves provide an opportunity for families and children: to practice the skills they have learned and to strengthen their relationships; it also provides an opportunity to assess if a child is ready for discharge to the family home. We recommend that payment for therapeutic leaves remain, as this promotes the goal of quality treatment and the successful transition to a less restrictive setting (e.g. home).

2878

Erhard, E. Shaye

14-522-19

From: Dottie Lynch [dlynch@pathcenter.org]
Sent: Monday, November 22, 2010 11:15 AM
To: PW, RTFComments
Subject: No.14-522
Attachments: Comments_Chapter 23 RTF Regs.doc

RECEIVED

NOV 22 2010

Attached please find PATH comments re: proposed rtf regulations

BUREAU OF CHILDREN'S SERVICES

From: Linda Cucinotta
Sent: Monday, November 22, 2010 11:10 AM
To: Dottie Lynch
Subject:

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