



MOMSTELL

...because no family should face the disease of addiction alone

2878

P.O. BOX 450
Mechanicsburg, PA 17055
(717) 730-2020
MOMSTELL@verizon.net
www.MOMSTELL.org

November 22, 2010

Shaye Erhard
Division of Children's Policy and Program Development
Bureau of Children's Behavioral Health Services
Office of Mental Health and Substance Abuse Services
Department of Public Welfare

Dear Ms. Erhard,

RE: Residential Treatment Facilities Regulations No. 14-522

On behalf of MOMSTELL, It is extremely difficult for family organizations to go through this lengthy document thou thoroughly in the 30 day time period allotted. I will express some of the concerns that I do have regarding the document, but have not had the time to go through this document with a clear understanding of how these regulations affect substance abuse and co-occurring disorders.

- In looking at section 23.57- regarding Mental Health workers and Aids. Nothing is mentioned about D&A training. That would definitely have impact on their care. So how will that affect those youth who have substance abuse/co-occurring disorders?
- In 23.58 the only requirement for an overnight watch for children in the RTF is be over 21 and have a highs school education. This is concerning to me that if anything were to happen to a child during the night, it is possible the "only" required" responder could be this untrained 21 year old.
- In 23.60- What is the definition of a "family advocate"? Are these advocates trained in MH/SA? What are the age requirements? What about the peer specialists that can be paid already by MA, could they be utilized?
- Also in section 23.62 under staff training, I do not see D&A training listed or training for co-occurring disorder.

As I said prior, I am sure there are other things that need to be addressed but I would need more time to review this document. I would ask that the time for comments be extended so that a more comprehensive review could take place.

Thank You,

Sharon L. Smith

Sharon L. Smith
President, MOMSTELL

2878

14-522-35

Erhard, E. Shaye

From: Sharon Smith [ssmith@momstell.org]
Sent: Monday, November 22, 2010 3:48 PM
To: PW, RTFComments
Subject: REGULATION NO 14-522
Attachments: Letter for RTF Reg comments 11-22-2010 Sharon Smith.doc

RECEIVED

Importance: High

NOV 22 2010

Hello,

BUREAU OF CHILDREN'S SERVICES

I am writing regarding the RTF regulations No 14-522. I have attached my letter of comment. I would have liked more time in order to have reviewed this important document more thoroughly.

Thank you,
Sharon L. Smith

Sharon L. Smith
MOMSTELL Inc.
P.O. Box 450
Mechanicsburg, PA 17055
717-730-2020
ssmith@momstell.org
www.momstell.org



*... because no family should face
the distance of isolation alone*