

Erhard, E. Shaye

2878

14-522-48

From: Spangler, Robena [RSpangle@nhsonline.org]
Sent: Friday, December 03, 2010 4:40 PM
To: PW, RTFComments
Subject: FW: NHS Human Services Comments
Attachments: NHS Human Services.doc

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DEC - 6 2010

Importance: High

DEPT. OF TRANSPORTATION

Dear Shaye:

I received a systems administrator email return when I attempted to send this to you and Stan. I'm resending to the comments mailbox. If you any questions, please contact me at 717-441-9512 or via email. Thanks.

Robena Spangler

From: Spangler, Robena
Sent: Friday, December 03, 2010 4:38 PM
To: Clark, Carl
Subject: FW: NHS Human Services Comments
Importance: High

For your information...

From: Spangler, Robena
Sent: Friday, December 03, 2010 4:35 PM
To: 'eehard@state.pa.us'
Cc: 'smrowzowski@state.pa.us'
Subject: NHS Human Services Comments
Importance: High

2010 DEC - 8 P 1:30

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Dear Shaye:

We apologize for the late submission of the RTF comments regarding the proposed regulations. In conversation with PCPA, we were encouraged to submit our input even though we missed the deadline.

Thank you for your consideration and please feel free to contact Robena Spangler or Carl Clark for further information.

Robena Spangler-rspangle@nhsonline.org or cclark@nhsonline.org.

**NHS Human Services
Proposed Regulations
Provider Comments**

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The following comments reflect the proposed regulations' impact on RTF services provided by NHS Human Services:

23.14 Maximum Capacity

An RTF shall not exceed 4 units of 12 beds each for a total of 48 beds-currently NHS manages an RTF in the Northeast region of the Commonwealth, the capacity is 70 beds. The proposed regulation will have a significant financial impact and create a reduction in service provision for children and adolescents. If this provision remains intact, it will require NHS to engage in rate negotiating and MA rate negotiation. New rates would have to be negotiated with potentially 7 payors. Some HealthChoices contract independently, therefore, an extension of 24 months should be allowed for managing the reduction of the bed capacity.

23.41-23.44 Family Involvement in the treatment process
Documentation of efforts for family contacts
Space onsite for family visits
Assistance with coordination of transportation for family contacts

The proposed regulation lacks clarity regarding "assistance with travel arrangements for families". NHS will incur additional costs related to vehicles (fuel, maintenance and purchase of vehicles, etc) and the staffing necessary to accommodate the increase travel.

23.51-23.62 Staffing Qualifications

The proposed regulation requires NHS to adhere to additional qualifications for staff include Bachelor's level Mental Health Workers and Mental Health Aides. Currently, our staffing is based on 3800 regulatory standards for education and experience of staff.

The proposed regulation would NOT include Mental Health Aides in the overall child to staff ratio. The proposed regulations do not address what providers are to do about their current staff complements. Staff with proven skills working with children should have the ability to be "grandfathered" in based on their skill level and experience. Through attrition, staff would be replaced in order to meet the proposed regulatory standards.

The proposed regulation requires RTF programs to have a Medical Director who will provide two (2) hours per week of psychiatric services for every five (5) children. The medical director is required to contact the child's family on a regular and ongoing basis face-to-face or by phone. Additionally, this individual is required to provide regular and ongoing contact with community agencies and natural supports. The proposed regulation doesn't address how application of the standard would impact programs with less than 12 beds. Flexibility with psychiatric time is essential. For example, children with Autism may not require this level of psychiatric care due to their unique behavior needs. Access to telepsychiatry due to limitations associated with overall accessibility of Child and Adolescent Board Certified psychiatrists across the Commonwealth.

Finally, the proposed regulations provide an exemption for RTF's and Community Residential Rehabilitation Group Homes from the scope of the 3800's. This exemption will give eight (8) bed non-accredited RTF's (not located on a campus) the option to meet the requirements in Chapter 5310. NHS operates small community-based, non-accredited RTF's. The per diem rates for these services would be significantly impacted due to the delivery of therapeutic services within the treatment milieu of these programs.