

## **PAPSRS**

PENNSYLVANIA ASSOCIATION FOR PSYCHOSOCIAL REHABILITATION SERVICES P.O. Box 62072 • Harrisburg, PA 17106-2072 • 1-(888)-490-0404 • papsrs@comcast.net

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March 16, 2013

Bill Boyer, Section Chief, Program Development OMHSAS DGS Annex Complex 21 Beech Drive Harrisburg, PA 17110

Dear Mr. Boyer,

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On behalf of the Pennsylvania Association of Psychiatric Rehabilitation Services (PAPSRS), I am submitting the following comments regarding 'Final Form Regulation #14-521' (IRRC#2879) Psychiatric Rehabilitation Service for discussion during the April 4, 2013 meeting of the IRRC.

PAPSRS is a membership organization representing one hundred and seventy-five organizations and practitioners providing psychiatric rehabilitation services within Pennsylvania. As such a state-wide organization representing providers of psychiatric rehabilitation services, PAPSRS is a significant stakeholder in this proposed regulation which would pertain to the psychiatric rehabilitation community in Pennsylvania. Through discussions with our membership, PAPSRS has had the opportunity to review and discuss the implications of these proposed regulations for the practice of psychiatric rehabilitation in Pennsylvania- and its impact on those served by these services.

As such a stakeholder, PAPSRS had submitted comments on November 19, 2010 in response to the first public commentary period. We have also reviewed the response provided by the Department of Public Welfare (DPW) and the Office of Mental Health and Substance Abuse Services (OMHSAS) to our initial public comments.

After review of the above noted documents and along with a review of the 'Final Form Regulation# 14-521', PAPSRS strongly believes that the form and content of these final form regulations is a significant

improvement over the standards presently in use and we strongly support enactment of these proposed regulations.

PAPSRS believes that when enacted the 'Final Form Regulation #14-521' will serve the citizens of Pennsylvania well by strengthening the definition of Psychiatric Rehabilitation Services (PRS) and through providing for PRS standards of practice which adhered to professionally recognized values, methodologies and outcomes.

With enactment of this proposed regulation, the citizens of Pennsylvania who utilize PRS services will benefit in their ability to receive recovery oriented, innovative, and state-of-the-art approaches to support them in regaining productive and valued roles in their communities.

PAPSRS supports the codification of these PRS regulations as soon as possible.

If appropriate, I will be happy to address any questions regarding these comments by phone at 717-502-6106 or email: papsrs@comcast.net.

Sincerely,

Scott T Heller, PsyD, CPRP Executive Director-PAPSRS

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