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March 27, 2013

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

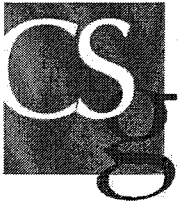
Mr. Boyer and IRRC Hearing Committee,

On behalf of Community Services Group, I am submitting the following comments regarding the Final Form Regulation #14-521 (IRRS #2879) Psychiatric Rehabilitation Service for discussion during the April 4, 2013 hearing of the IRRC,

CSG is a human service agency that provides behavioral health and intellectual and developmental disability services to children and adults in 19 counties in Pennsylvania. CSG has a long history supporting recovery and rehabilitation based programs throughout central Pennsylvania, opening its first site-based psychiatric rehabilitation program in Northumberland County in 1994. Since then we have expanded our psychiatric rehabilitation services to include 5 clubhouse programs with ICCD (International Center for Clubhouse Development) certification, 5 licensed site-based psychiatric rehabilitation programs, 4 licensed mobile psychiatric rehabilitation programs, 2 social rehabilitation programs and 2 unlicensed mobile psychiatric rehabilitation programs. We have assisted many individuals in their recovery helping them to find satisfaction and fulfillment in the life role of their choice.

The longevity that CSG has in psychiatric rehabilitation, I believe offers a unique perspective on the history of the state standards and the growth of the field over the past 20 years. Psychiatric rehabilitation has become a recognized and evidence based service throughout the commonwealth. Many behavioral health managed care organizations recognize its benefit and authorize psychiatric rehabilitation as a supplemental service to its members.

As a stakeholder, CSG had active involvement in the Office of Mental Health and Substance Abuse Services (OMHSAS) process of developing the proposed regulations. CSG staff sat on the development workgroup and submitted comments during the first public commentary period. We reviewed the department's responses to the initial public comments as well as the Final Form Regulation #14-521.



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CSG is in support of the proposed regulations. We feel that they are a vast improvement over the current standards that we currently operate under. The professionally recognized values and practices will benefit all individuals that utilize this service in their recovery.

CSG supports the enactment of the Final Form Regulation #14-521.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer McLaughlin', is written over the typed name.

Jennifer McLaughlin, BSE, CPRP

Senior Program Director

Community Services Group