

EMBARGOED MATERIAL

2879

PARF

Pennsylvania Association of Rehabilitation Facilities
2101 North Front Street, Building 3, Suite 200, Harrisburg, PA 17110
Phone: 717-745-9170 Fax: 717-364-3287 Email: parfmail@parf.org

April 2, 2013

Bill Boyer, Section Chief, Program Development
Pennsylvania Department of Public Welfare
Office of Mental Health and Substance Abuse Services
DSS Annex Complex, 21 Beech Drive, Harrisburg, PA 17110
wboyer@pa.gov

RE: Psychiatric Rehabilitation Service
Final-Form Regulation #14-521
IRRC#2879

Dear Mr. Boyer:

The Pennsylvania Association of Rehabilitation Facilities (PARF) represents more than 100 organizations statewide that provide community health and human services, including psychiatric rehabilitation services, to people with disabilities.

PARF has been engaged for more than two decades in efforts of the Department of Public Welfare Office of Mental Health and Substance Abuse Services in planning and developing a comprehensive set of regulations for psychiatric rehabilitation services. Psychiatric rehabilitation service providers in PARF have participated in review groups and offered extensive comments on draft regulations.

PARF strongly supports the final rules for psychiatric rehabilitation services and encourages the Independent Regulatory Review Commission to approve the final form regulations at its meeting on April 4.

We look forward to working with you in offering providers information and technical assistance to assure proper implementation of the regulations.

Sincerely,

Gene Bianco
PARF President/CEO

cc. Independent Regulatory Review Commission
IRRC@state.pa.us

2013 APR -2 PM 3:31

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Gene Bianco
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2013 APR -3 PM 2:50

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IRRC

April 2, 2013

William Boyer, Section Chief, Program Development
Office of Mental Health and Substance Abuse Programs
DGS Annex Complex
21 Beech Drive
Harrisburg, PA 17110

2013 APR -3 PM 2: 50

Re: Psychiatric Rehabilitation Services Final-Form Regulations (14-521), IRRC No. 2879

Dear Mr. Boyer:

The Philadelphia Community Integrated Recovery Center (CIRC) Collaborative is respectfully submitting comments in regard to the above Psychiatric Rehabilitation Regulations.

5230.51(c)(3)---Staff Qualifications---Certified Peer Specialist---"A staff member with a CPS certificate and no additional work experience is qualified to work as a psychiatric rehabilitation assistant."

The work of Certified Peer Specialists is integral to the operation of the CIRC programs in Philadelphia and limiting their ability to work independently in the community for a year would cause undue burden on the programs due to the turnover rate of CPS.

5230.22(4). REGULATION SECTION---{RECORD} DOCUMENTATION STANDARDS AND RECORD SECURITY, RETENTION AND DISPOSAL---This specifically states, "The record must indicate progress at each day of service, changes in service and response to services."

5230.22(4) and 5230.63---Documentation Standards and Record Security, Retention and Disposal---Daily Entry; Daily Entry. "Since the record is required to indicate the individual's progress at each visit, a daily entry is required. The daily entry also ensures accountability and verification that the service is provided."

The CIRC programs are a unique blend of services and the requirement of a daily note may unduly shift focus on documentation rather than service delivery. However, the CIRC programs are interested in continuing dialogue to make sure that we can effectively meet the regulations while continuing to provide quality services.

2879

April 3, 2012

EMBARGOED MATERIAL

To Whom It May Concern:

I have been in the mental health system for many years as a client and a staff member at University of Pittsburgh Medical Center; Western Psychiatric Institute and Clinic for 13 years. I am writing in the interest of the 150-200 individuals at our Comprehensive Care Services, Psychiatric Rehabilitation Clinic who attend this program.

We would like to see bus transportation monies provided for clients who attend Psych Rehab Programs such as ours so they can get back and forth to our program.

Our clients benefit psychologically and vocationally from the program. Including Psychiatric Rehabilitation as a line item in the budget becomes the wise thing to do financially when you look at it. It is estimated that the funding for each individual we are seeking would be in the order of \$75.00-\$90.00 a month. On the other hand, if an individual is left to their own devices without attending a program such as ours without such support, it might cost \$5,000 a day or \$150,000 a month for an inpatient hospitalization!

The other point we want to make is that it is morally wrong to not consider parity of therapy charges. Physical Rehabilitation has long been accepted as a billable item. We are saying that Psychiatric Rehabilitation should receive the same consideration of funding.

So, it is not only a financial win-win situation but a moral triumph as well for us to realize transportation funding for Psychiatric Rehabilitation across the state.

Thank -you for your serious consideration of this matter.

Kathy Krause

2013 APR -4 AM 8:23

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APR-03-2013 WED 02:26 PM

FAX NO.

P. 02

COUNTY OF ALLEGHENY



**RICH FITZGERALD
COUNTY EXECUTIVE**

**Medical Assistance Transportation Program
One Smithfield Street / First Floor
Pittsburgh, PA 15222-2225
Phone: 1-888-547-6287
Fax: 412-350-2729**

March 3, 2013

To Whom It May Concern:

MATP was averaging approximately 2000 one-way trips per month (11-12 program year) for MA clients attending psych rehabilitation services throughout Allegheny County. These figures include riders using public transportation as well as the door to door ACCESS shared ride system.

James Farwel
MATP Administrator

**MARC CHERNA, DIRECTOR
DEPARTMENT OF HUMAN SERVICES
OFFICE OF COMMUNITY SERVICES
HUMAN SERVICES BUILDING • ONE SMITHFIELD STREET • SUITE 200 • PITTSBURGH, PA 15222
PHONE (412) 350-6611 • FAX (412) 350-2786**

APR-03-2013 WED 02:07 PM

FAX NO.

P. 03

**Medical Assistance Transportation Program
Memorandum
MATP OPS # 06-2011-023**

Date: June 8, 2011
Subject: Clarification of Transportation Policy for Psychiatric Rehabilitation Services
To: All Statewide County MATP Offices
From: Tyrone E. Williams, Director, Division of Medical Assistance Transportation

Purpose:

The Medical Assistance Transportation Program is clarifying existing policy regarding transportation to Psychiatric Rehabilitation Services.

Background:

The MATP Instructions and Requirements, section 5.N, clearly states, "Psychiatric Rehabilitation Service is not an MA covered service." While there may have been some confusion regarding the provision of Psychiatric Rehabilitation Services (PRS), we are confirming that PRS is not a MATP covered service.

Discussion:

Several counties are presently transporting Medical Assistance recipients to clubhouses and other social and vocational rehabilitation programs. These programs offer therapeutic services that are MA compensable, but are not MATP eligible. We have confirmed that PRS is not to be added to the State Plan as a covered MATP service, and MATP county offices shall no longer transport to any psychiatric rehabilitation services.

Next Steps:

If you are currently transporting recipients to clubhouses and other social and vocational rehabilitation programs, recipients should be given 30 days notice that transportation to PRSs will no longer be provided. The notice should reiterate the continued eligibility of covered services under behavioral health.

Should you have any additional questions or need further assistance in implementing any aspect of this Operations Memo, please contact your program advisor.

APR-03-2013 WED 02:07 PM

FAX NO.

P. 02



COMMONWEALTH OF PENNSYLVANIA

~~JUL~~ 25 2011

Dear County Administrators/BH-MCOs:

As follow up to correspondence sent on June 8 and July 18, 2011 regarding MATP transportation to psychiatric rehabilitation services (PRS), the Department continues to explore various options to support the continuity of transportation to psychiatric rehabilitation programming statewide.

As previously indicated, effective July 31, 2011, MATP will no longer reimburse the cost of transporting individuals to psychiatric rehabilitation services. This policy change was necessary in order to continue administration of the MATP program and re-align it with its original mission to provide transportation to services identified in the State Plan. While earlier efforts were made to transition psychiatric rehabilitation into the State Plan, budgetary constraints did not make this possible at this time. Insofar as psychiatric rehabilitation is not an In-Plan service, MATP can no longer extend transportation services to cover PRS at this time. As this date represents an extension from the previous termination date of June 30, 2011, additional extensions cannot be granted at this time. However, to ensure service transport moving forward, counties are encouraged to develop agreements directly with their MATP coordinators to continue transportation services until such time that other arrangements can be made.

Also, to the degree possible, county psych rehab programs should encourage individual mobility training for individuals to support their ability to independently attend programming using public transportation as appropriate and needed.

Again, OMHSAS is requesting that BH-MCOs and PRS providers continue to work together to ensure that consumers impacted by this policy understand how they will continue to obtain and receive services.

Your cooperation during this transitional time is greatly appreciated. Thank you for your efforts to continue psychiatric rehabilitation as a viable service in your county.

Sincerely,

Sherry H. Snyder
Acting Deputy Secretary

Two Years at the Clubhouse

by Jim McKenna

I was not in good shape the year I came to the Clubhouse. My wife had died the year before after a long illness. I had stopped working three years previously to take care of her. Without her I felt lost and purposeless and became increasingly isolated. Since I have had a lifetime of problems with depression, this was very dangerous.

Marie, my therapist at Bellefield Towers, began suggesting the Howard Levin Clubhouse. She said it would be a good way to reconnect with people and rediscover some purpose. My psychiatrist made similar suggestions. I pretended to listen but inwardly rejected the idea. I've always been afraid of new situations and didn't want to push myself to try this one. I also couldn't grasp the Clubhouse "idea." I was sure, with the certainty that only ignorance can bring, that it was nothing more than a glorified drop-in center.

In the spring of 2010 things fell apart. I wound up spending 16 days at Western Psych and another couple of months in their partial hospitalization program. I decided I'd better trust my medical professionals advice, rather than my own, and give the Clubhouse a try. Marie had been saying for months that I needed to get out to be with other people. The Clubhouse now seemed to me to be the best way of doing this.

My first day was different than I expected. There were a lot of people doing a lot of work. Some of them, I was told, were "staff," but most were "members." One member had been on the same Western Psych floor as me in the Summer of 2009. He spent some time explaining things to me and showed me some of the different tasks. This was a big help, and since then I've tried to do the same with new members.

I felt comfortable with our work-ordered day from the beginning. I had worked in offices for over 25 years, so I was familiar with the general routine and many of the tasks. For a while I ran around trying to do everything, as long as it didn't involve the kitchen, but I came to realize that this wasn't good for either myself or the Clubhouse. I've had problems throughout my working life with overextending myself and prioritizing tasks. The Clubhouse staff has worked with me on this and other issues. Incidentally, I eventually found my way to the kitchen and now enjoy helping out there.

I have enjoyed my two years at the Clubhouse. I like the lack of hierarchy and the relaxed but professional atmosphere. I like having a reason to get out of bed every morning, because every day I come in there are things going on I can enjoy and learn from. I have many good friends here, both members and staff, and I enjoy being with them. They've helped me a lot and I've helped them as well. I am deeply grateful and proud to be a member of the Howard Levin Clubhouse.



THE OPEN DOOR

PAGE 9

My Member Anniversary
by Mike Hogan

I arrived at the Howard Levin Clubhouse shortly after my birthday in February of 2006. I was brought here by Steve of the Office of Vocational Rehabilitation. He decided that OVR had exhausted its resources to help me, and that I needed a different kind of vocational assistance. He thought that the Clubhouse might be the answer. As it stands, he was right on the mark.



At first, I was bewildered by the Clubhouse. People seemed to be rushing around, doing things that made no sense to me. Nonetheless, I decided to give it a try. Everyone seemed so nice, which was quite different from my experiences in life.

It took me some time to get used to the Clubhouse way of working. Tasks were distributed voluntarily, rather than assigned. Given my background in administration, I gravitated to clerical functions. First, I worked in Member Services. One of the funniest things that I did for Member Services was to make my own birthday card one year. With the coming of Sarah Hughes as the new B/E coordinator, I moved to the Business/Employment Unit (now the Business/Employment/Education area).

The great attraction of B/E for me was the revival of the HLC newsletter, *The Open Door*. I volunteered to write a music column, which I dubbed "Bargain Bin Record Reviews." I figured that this would last a month or two. I had no idea that I would still be writing it for six years and counting. I'm quite proud of my achievement. It is my baby, and I guard it jealously.

One of the things that I had to get used to was the "historically Jewish character" of the Clubhouse. As a practicing Catholic, I had a rudimentary exposure to Jewish life and traditions. The Clubhouse, and its Jewish members, gave me a fine respect for Jewish culture, holidays, and the kosher laws. Now, I know why we use noisemakers at Purim, and a third set of dishes at Passover. I have come to defend the Clubhouse's Jewish character, as I think it gives HLC its central role in the community.

One of the honors bestowed upon me was to be the first member to work at the Law Office of Jay Fingeret. This was fortunate for me because a law career was one of my objectives of my Goal Plan. I learned a lot at Jay's law office. Not just shredding and filing, but also patience and pleasantness. I must thank Jay and his wife Ilene for their tireless efforts to assist me in these invaluable skills and personality traits.

In the last six years, the Clubhouse has become a second home for me. Having lost both my father and mother, the members and staff have become like family. I've come to depend upon them for support and validation. I must thank Steve, as well, wherever he is, for introducing me to this wonderful organization. My experiences at the Clubhouse have materially improved my psychiatric health, and imbued me with a sense of social grace that I had never experienced before. My sincerest thanks to all of my friends, and I expect to be celebrating many more member anniversaries. Thank you.

Member Testimonials about the Clubhouse

Joe – “Before I came in I had nothing to do and nobody to talk to. It was quite maddening. Now things are a lot better. I’ve made a lot of good friends and feel a lot more independent.”

Patty – “I started coming to Howard Levin Clubhouse four years ago. During that time, we have been to many social events. There are a lot of different things a person can do at the Clubhouse, and the people and staff are wonderful, easy-going people.”

Bill – “Coming to the Clubhouse has been instrumental in structuring my life. The atmosphere fosters both personal growth and achievement, which has given me a stronger and healthier sense of self-worth.”

Dianne – “Coming to the clubhouse has helped me to isolate less. The work ordered day gives me something to do that I feel accountable for and this has boosted my self-esteem.”

Pat – “Being a member of the Clubhouse provided me with a sense of purpose by feeling productive. The members and staff have become ‘*my family*’. The atmosphere here is so positive...not clinical. We focus on recovery. We are not our disease...we are functioning, productive people doing meaningful work! I love it here!”

Ed – “I originally came here on the suggestion of my psychiatrist. I learned, and am still learning new skills, but perhaps the most important of all these skills is showing me that I can socialize in an open atmosphere. Before, I was isolated; now, I am more social.”

Jim – “My therapist referred me to the Clubhouse to help combat the feelings of isolation and uselessness that had led to several hospitalizations. We agreed that I needed to connect with people and find a sense of purpose. The Clubhouse has enabled me, far more than I expected, to do both.”

Stan – “As a long time member, the Clubhouse has always been a peaceful oasis in what can be a tumultuous and unforgiving world.”

Lee – “I had been out of the work force for several years and was isolating socially. My therapist recommended that I come to the Clubhouse. I’ve become more social and have returned to part-time work thanks to the social and work skills I’ve learned here at the Clubhouse.”

Mary – “They say it takes a village to raise a child, and the HLC is my village. It has brought me from a purposeless existence to a meaningful life.”

Michael – “My therapy was at a dead end. Conventional therapies could not allow me to progress any further. The HLC opened new vistas for me.”

Aileen – “I found out about the Clubhouse from JRS Supportive Housing. Since joining I feel better about myself. I socialize much more easily and feel much more comfortable around people.”