

Comments:

Under the definition section

Licensed Practitioner of the healing Arts – after the discussion at the webinar it is understandable why this was kept vague and it is appreciated. However, can a separate bulletin be posted providing what the current acceptable practitioners are?

5230.11

(1) Develop a PRS advisory board that includes participation by individuals and families who utilize mental health services.

Can someone please clarify, in a clubhouse model a PRS advisory board makes perfect sense? However, it is not as clear for other models. Can you please clarify their purpose and function?

5230.13

(iii) Policies regarding transportation of individuals.

Can someone clarify this more due to the fact that it is under the HR section, are they looking for something specific in a policy?

(vi) Staff work schedules and time sheets.

Can someone clarify the need for maintenance of timesheets and its relevance to the PRS services?

5230.51

Has any further consideration been made to grandfathering of any positions? Possibly in the specialist category, especially considering the financial cost to acquire and maintain the certification. Many companies do not cover these expenses and the USPRA rates continue to rise as well.

5230.55

- (c) A PRS director or PRS specialist shall meet with staff individually, face-to-face, no less than two times per calendar month.
 - (d) A PRS director shall provide additional supervision utilizing the following methods:

Could there be further clarification with this. With the second statement adding the word additional it leads for the interpretation of this section to mean that there must be two individual face to face at least twice per month separate from anything listed below (d). Is this correct?

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Sent:

Friday, November 19, 2010 1:41 PM

To:

Psych Rehab

Subject: Response to Public Comment

INDEPENDENT REGULATORY REVIEW COMMISSION

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Enclosed are our comments on the proposed rulemaking.

Thank-you.

BUREAU OF POLICY AND PROGRAM DEVELOPEMENT

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