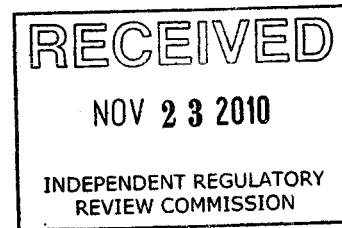


COMMUNITY
SERVICES GROUP

2879



November 22, 2010

Ms. Lisa McMullen
Department of Public Welfare
OMHSAS, BPPD
PO Box 2675,
DGS Complex
Harrisburg, PA 17105-2675

On behalf of Community Services Group (CSG), I am submitting the following comments and concerns regarding Regulation No. 14-521, proposed rule making published in the Pennsylvania Bulletin (40Pa.B 6101), Oct. 23, 2010 and pertaining to regulations for Psychiatric Rehabilitation Services.

CSG is a provider organization that offers mobile, site-based and clubhouse psychiatric rehabilitation throughout central Pennsylvania. In some areas CSG has been providing psychiatric rehabilitation services for more than 15 years.

CSG believes that the proposed regulations are a very positive step in Pennsylvania for the recovery movement. Overall we believe that the proposed regulations will enhance current psychiatric rehabilitation services and assist with the expansion of this service across the commonwealth.

A few areas of question that we would like to see additional clarification or deliberation on are as follows:

5203.3 Definitions – Licensed Practitioner of the Healing Arts – if this could also include a list of who is currently considered under this definition.

5230.51 Staff Qualifications – Will there be any considering of grandfathering program director level of staff who have their CPRP, have years of experience in the field of psychiatric rehabilitation but do not have their bachelors degree?

5230.53 and 54 – Individual Services and Group Services – additional information of how these services will be able to be billed, required billing codes, and rates for one to one service, small groups in the community and larger groups offered at a program location.

5230.55 Supervision – While supervision is vitally important to any program is it necessary to be this prescriptive when discussing supervision. All staff benefit from individual supervision monthly but do seasoned staff really benefit from individual supervision more than that. Group supervision done in staff meeting can be more beneficial because of the lived experience and sharing of ideas.

5230.56 Staff training requirements – Eight hours of training in the specific PRS approach prior to the new staff working independently in addition to the six hours of face to face mentoring of service delivery by a supervisor before services are delivered independently is rather cumbersome and redundant for programs. If this could be combined would be a benefit to staff and supervisors. Each new staff does need to receive an overview of the approach used by the program they are working in but 8 hours of training seems a bit arbitrary and arduous. Instead if the 8 hours would include an overview of the approach utilized and 6 hours of face to face mentoring this would allow new staff to have a more experiential learning experience.

Again CSG believes that the proposed regulations will be invaluable to Pennsylvania moving forward and supports their implementation. Thank you for your time and consideration.

Sincerely,



Jennifer McLaughlin, BSE, CPRP
Senior Program Director
Community Services Group

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TO: Lisa McMullen

FROM: Jer McLaughlin

FAX: 717-772-7964 Number of pages: 3