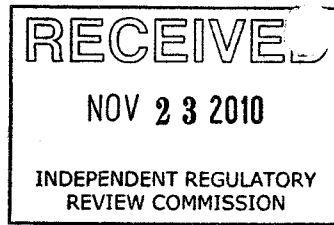


2879



November 22, 2010

Primary Contact for Public Comment re: IRC # 2879-14-521      Psychiatric Rehabilitation Services (PRS)

Noraliz Campanella  
OMHSAS  
P.O. Box 2675  
DGS Complex  
Harrisburg, PA 17105-2675  
Email to: [PsychRehab@state.pa.us](mailto:PsychRehab@state.pa.us)

Dear Noraliz Campanella:


Thank you for the opportunity to provide comments on the proposed regulations for Chapter 5230 Psychiatric Rehabilitation Services (PRS).

1. General - PRS services are intended to assist individuals to live, learn and work in the community and require interventions based upon a functional assessment and individualized goal planning. The interventions are focused in the context of their daily environment and successful independence. Skill building and other services actively involve the individual in changing their life. Psychiatric rehabilitation services are quite rigorous and not comparable to existing social rehabilitation programs, supported living services and among non-certified clubhouses. These programs tend to support individual by doing with them the activities of daily living and providing enrichment and socialization activities.
2. General - While Pennsylvania's shift to psychiatric rehabilitation is a positive and compelling system change, it would not be cost neutral based upon the number of medical assistance eligible persons with serious mental illness who are currently using social rehabilitation and supported living programs. While the expectation that persons in recovery using psychiatric rehabilitation services may off-set treatment costs these estimates should be very conservative and would not necessarily be in outpatient psychiatric clinics which are primarily used for medication management and evaluations.
3. Facility records – Please clarify the crisis response requirements of staff in PRS and whether they are intended to include 24 hour/7 day per week responsibility.
4. Admission requirements – (b) Please include under this statement that documentation of a functional assessment should be conducted by a CPRP certified staff.
5. Staffing qualifications– None of this section included the option to have “ands/ors” among the listing of various staff qualifications but having such options may improve the providers availability to attain and maintain licensure.
6. General staffing pattern - Provider Facility qualifications based upon 25% of staff being credentialed or enrolled in credentialing will be difficult to manage. During a year one period the program/agency may be in and out of compliance. How will that evaluated or assessed in licensing and an audit ?
7. Staffing training requirements – How will training availability/costs and provider/employee certification costs be addressed after regulations are approved ?

8. General – Psychiatric rehabilitation services in practice incorporate housing and employment goals and interventions. The regulations do not include a scope of service or interventions. Will supported employment programs meet these standards? Will PRS incorporate more best practices from Supported Employment as an evidenced based model program?

Thank you for the opportunity to share these comments and questions as a part of the review process.

Sincerely,

A handwritten signature in cursive script that reads "Daniel E. Eisenhauer".

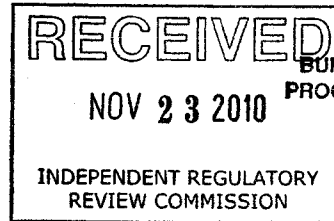
Daniel E. Eisenhauer  
MH/MR Administrator

**Campanella, Noraliz**

**From:** Eisenhower, Dan [DEisenhauer@dauphinc.org]  
**Sent:** Monday, November 22, 2010 11:30 AM  
**To:** Psych Rehab  
**Cc:** Schultz, Rose (MHMR)  
**Subject:** Draft Pysch Rehab Regulations comments

**RECEIVED**

NOV 22 2010

BUREAU OF POLICY AND  
PROGRAM DEVELOPEMENT

Attached are comments re: proposed regulations for PSR.

Thank you for the opportunity to comment

Daniel E. Eisenhower, Administrator  
Dauphin County MH/MR Program  
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Harrisburg, PA 17101  
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