14-521-11

OMHSAS PROPOSED PSYCHIATRIC REHABILITATION REGULATIONS PATH'S RENAISSANCE SERVICES PARTICIPANTS/FAMILY MEMBERS COMMENTS INDEPENDENT REGULATORY REVIEW COMMISSION

The following comments are submitted by participants and family members from PATH's Renaissance Services, a Psychiatric Rehabilitation Program based in Philadelphia. When the proposed Psychiatric Rehabilitation regulations were reviewed with this group the response evoked many emotions including anxiety, fear, discouragement, and anger. The primary concerns were the loss of the ability of the staff to continue to provide the creative, caring, and personalized services due to the burdensome nature of the paperwork mandated by these potential regulations and the exclusion of peers who would benefit by psychiatric rehabilitation services.

5230.31 Admission Requirements

The admission requirements are too restrictive and would exclude individuals who would benefit from this service. The comments included that it is "not fair" to disallow admissions if there is a "need". One participant commented that it took 2 years before the psychiatrist and therapist determined her "correct" diagnosis and if these regulations were in existence she would have been denied PRS. The participants viewed the proposed regulation as "discriminating" and "if people need help they should get it". Minimally, we would like to request that an exception procedure be available.

5230.63 Daily Entry

"A daily entry is unacceptable as it would take away time from the rehabilitation process and from the participants. The staff are very excited to work in this program and provide us with support in helping us to identify goals and learn skills to help us to be successful and satisfied. The staff will be depleted of this energy if they need to write daily notes and then try to find each of us for a signature. This will become much of their focus". "I was in the Partial Program when the staff wrote daily notes and that took time away from me." The participants believed that services would be "compromised" and that they "would not get the attention we deserve". A family member echoed these thoughts and feared that not only would the participants not receive energized services but that family members also would not experience the level of inclusion as she does now. The participants emphasized the collaborative relationship they enjoy and believe daily notes would "cut down on the personal relationship" and "I'd be sad if I couldn't meet with staff the way I want to". One participant stated that "I might think twice about batting an idea around to a staff person due to the amount of work they have". This discussion evoked much anxiety and participants believed staff would have "lower morale" and "become like robots".

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5230.62Individual Rehabilitation Plan5230.61Assessment

The participants had similar comments to the proposal regarding revising and reviewing both the Individual Rehabilitation Plan and the Assessment when one objective is met. Comments included: "This could confuse me terribly. Let me finish one thing before I start a new one. Let me catch up". A family member stated that "this was too confusing for the participants". One participant noted that she would feel an "increase in anxiety if I needed to reassess each time I met an objective". Several participants commented "They are trying to take staff away from us with all the paperwork. They won't have time to talk to us". A participant added "it would be self defeating to accomplish an objective. We would just have to do more paperwork".

5230.51 General Staffing Patterns

The participants do not agree with the proposed regulation of 1:10 staff ratio based on average daily attendance; "I appreciate the service and funding but want it to be effective for me and my peers". "Staff should be where the people and need is".

RESPECTFULLY SUBMITTED BY RENAISSANCE PARTICIPANTS AND FAMILY MEMBERS

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Hello,

Please review the attached comments submitted by participants and family members of Renaissance Services, a Psychiatric Rehabilitation Service located in Philadelphia. The above stakeholders feel very strongly regarding several proposed regulations. If there are any questions please e-mail me at <u>mshuster@pathcenter.org</u>. Thank you,

Melissa Shuster

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