

14-521-9

# The Philadelphia Alliance

Representing Community Providers for People with Mental Illness, Intellectual Disabilities & Chemical Dependency Needs.

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November 19, 2010

2879

Lisa McMullen  
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Harrisburg, PA 17105-2675

PsychRehab@state.pa.us

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NOV 23 2010

INDEPENDENT REGULATORY  
REVIEW COMMISSION

**Subject: Proposed rulemaking in the Pennsylvania Bulletin,  
Regulation No. 14-521**

Dear Ms. McMullen,

The Philadelphia Alliance is an organization of more than 50 specialized agencies in Philadelphia that serve individuals who have mental illness, intellectual disabilities, and/or chemical dependency. Our member agencies employ well over 20,000 people and serve more than 100,000 people. The member agencies are listed in the left hand column of this letterhead.

Generally they proposed regulations, according to our members, seem workable. There are a few potential concerns, issues and/or questions that follow. The draft regulations seem similar to the Boston University model, which is a good model; but it does limit creativity from the program standpoint. Here are our specific issues:

**5230.10 Organizational Structure**

(a) Develop a PRS advisory board that includes participation by individuals and families.

- Will this require a separate advisory board or can PAC which represents multiple services meet the requirement.

**5230.20 Individual Record**

(c) Recommendation by a physician or licensed practitioner of the healing arts.

- This is not currently done and will create some challenges and delays in admissions since this will need to come from external providers.
- The referral process requires the same sign-off as CPS. This places the program back into a medical model and could slow down the referral process.

**5230.30 Admission**

(a) (2) Following diagnoses...

- The new regulations do not provide for exceptions to the diagnoses as in the current standards.

**5230.51 General Staffing Patterns**

(h) 25% of FTE staff complement shall meet specialist criteria within 1 year of licensing.

- Question: what's a specialist criteria

- Asociación Puertorriqueños en Marcha
- Barber National Institute
- Brooke Glen Behavioral Hospital
- CareLink Community Support Services
- Carson Valley Children's Aid
- Catholic Social Services
- Center for Autism
- Children's Crisis Treatment Center
- Child Guidance Resource Centers
- Children's Services, Inc.
- Community Integrated Services
- Congreso de Latinos Unidos
- CORA Services
- Devereux Community Services of Phila.
- Dunbar Community Counseling
- Elwyn, Inc.
- Gaudenzia, Inc.
- Green Tree School
- Hispanic Community Counseling Serv.
- Horizon House, Inc.
- Intercultural Family Services, Inc.
- JEVS Human Services
- KenCCID
- Ken-Crest Services
- Lynch Community Homes
- Mental Health Assoc. of SE PA
- NHS Philadelphia
- NorthEast Treatment Centers
- Northern Home for Children
- Partnership for Community Supports
- PDDC / ARC
- Pennsylvania Mentor
- Philadelphia Consultation Center
- Philadelphia OIC
- Programs Employing People
- Project Home
- Project Transition
- Public Health Management Corp.
- Quality Progressions
- Resources for Human Development
- Self-Help Movement, Inc.
- Special People in Northeast, Inc.
- St John's Community Services
- Step-by-Step
- Supportive Behavioral Resources
- Tabor Children's Services
- The Association for Independent Growth

**5230.51 General Staffing Patterns (continued)**

(i) 25% of FTE staff complement shall have CPRP credential

- Is the 25% in addition to the Director or could this count toward the 25%
- Although they allow for different levels of staff, it is similar to the CPRP requirement in that you would always have to exceed 25%.
- There is a potential issue with staff turnover in programs that are beyond the 2-year of initial licensing. Although the standards allow a specialist 2 years to attain the CPRP the 25% requirement would always be in effect. In effect you would always need to significantly exceed the 25%.

**5230.53 Group Services**

- There could be a few issues with this section for clubhouse. Previously clubhouses that met ICCD standards did not have a specific ratio requirement. Given the nature of clubhouse staff may be off site for T.E or other events. We generally should be okay with the 1:10 but this may present some limitations.

(a) Individuals participating in group services shall be working on similar goals.

- In the clubhouse most individuals are participating in "group services" through work units but may have very different goals

(a) (2) One staff may serve a group of two to five (2:5) ratio individuals.

- This appears to be an error; not sure if they mean 2 to 5 individuals per staff or 2 staff per 5 individuals.

**5230.54 Supervision**

(e) A PRS director shall annually evaluate staff

- Can this supervisory function be delegated to MPR supervisor as other supervisory functions?
- They use the term PRS director, would the person in charge have to use have that title or could it be "manager" or "supervisor"?

**5230.55 Staff Training Requirements**

C. (1) Eight hours of training in the specific PRS model or approach outlined in the service description prior to working independently.

- We would have to be aware of training opportunities internally or in the area prior to bringing a staff person on board.
- Question: Could the training be completed internally by their supervisor or does this require an external staff/agency to complete the training

**5230.62 Daily entry**

- Question: Having a PIR sign daily entries supports the medical model and not the Recovery Model, currently WA completes a weekly and monthly progress note

**2530.61 IRP**

(a) (7) Dated signatures. ... the PRS Director

- Is the Director expected to sign off on all plans of all PR services or can this be delegated as per supervisory responsibility?

Sincerely,  
Tim Wilson  
Executive Director



cc: **Independent Regulatory Review Commission, attention Michaele Totino, regulatory analyst (mtotino@irrc.state.pa.us)**

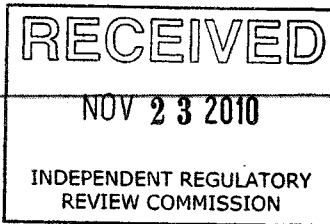
The Progressions Companies, Inc.  
United Cerebral Palsy of Philadelphia  
Walker Center at Bancroft  
Wedge Medical Center  
Wordsworth Academy

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**From:** Tim Wilson [tim@philalliance.net]  
**Sent:** Friday, November 19, 2010 4:22 PM  
**To:** Psych Rehab  
**Cc:** mtotino@irrc.state.pa.us  
**Subject:** Comment Re Proposed Rulemaking - ref Regulation No. 14-521

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**BUREAU OF POLICY AND PROGRAM DEVELOPEMENT**

Dear Lisa McMullen, Department of Public Welfare, OMHSAS, and Michaele Totino, IRRC

Please see the attached letter with our comments, questions, and concerns re the proposed rulemaking - from the Philadelphia Alliance of specialized agencies.

Thank you.  
 Tim Wilson  
 Executive Director