

2879

EMBARGOED MATERIAL RECEIVED
IRRC

April 2, 2013

William Boyer, Section Chief, Program Development
Office of Mental Health and Substance Abuse Programs
DGS Annex Complex
21 Beech Drive
Harrisburg, PA 17110

2013 APR -3 PM 2: 50

Re: Psychiatric Rehabilitation Services Final-Form Regulations (14-521), IRRC No. 2879

Dear Mr. Boyer:

The Philadelphia Community Integrated Recovery Center (CIRC) Collaborative is respectfully submitting comments in regard to the above Psychiatric Rehabilitation Regulations.

5230.51(c)(3)---Staff Qualifications---Certified Peer Specialist---"A staff member with a CPS certificate and no additional work experience is qualified to work as a psychiatric rehabilitation assistant."

The work of Certified Peer Specialists is integral to the operation of the CIRC programs in Philadelphia and limiting their ability to work independently in the community for a year would cause undue burden on the programs due to the turnover rate of CPS.

5230.22(4). REGULATION SECTION---{RECORD} DOCUMENTATION STANDARDS AND RECORD SECURITY, RETENTION AND DISPOSAL---This specifically states, " The record must indicate progress at each day of service, changes in service and response to services."

5230.22(4) and 5230.63---Documentation Standards and Record Security, Retention and Disposal---Daily Entry; Daily Entry. "Since the record is required to indicate the individual's progress at each visit, a daily entry is required. The daily entry also ensures accountability and verification that the service is provided."

The CIRC programs are a unique blend of services and the requirement of a daily note may unduly shift focus on documentation rather than service delivery. However, the CIRC programs are interested in continuing dialogue to make sure that we can effectively meet the regulations while continuing to provide quality services.

TRANSACTION REPORT

P. 01

APR-03-2013 WED 03:17 PM

FOR:

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APR-03	03:17 PM	97720576	21"	2	FAX TX	OK	836	
TOTAL :						21S PAGES:	2	

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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Patricia Vance, Chairman
 Agency: Senate Public Health and Welfare Committee
 Phone: 787-8524
 Fax: 772-0576
 Date: April 3, 2013
 # of Pages: 2

RE: Department of Public Welfare's Regulation #14-521: Psychiatric Rehabilitation Services (#IRRC 2879)

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

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P.01

APR-03-2013 WED 03:38 PM

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DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
APR-03	03:37 PM	97720581	20"	2	FAX TX	OK	841	
TOTAL :						20S PAGES:	2	

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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Shirley Kitchen, Minority Chairman
 Agency: Senate Public Health and Welfare Committee
 Phone: 787-6735
 Fax: 772-0581
 Date: April 3, 2013
 # of Pages: 2

RE: Department of Public Welfare's Regulation #14-521: Psychiatric Rehabilitation Services (IRRC #2879)

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APR-03-2013 WED 03:21 PM

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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Gene DiGirolamo, Majority Chairman
 Agency: House Human Services Committee
 Phone 783-7319
 Fax: 772-2414
 Date: April 3, 2013
 # of Pages: 2

RE: Department of Public Welfare's Regulation #14-521:Psychiatric Rehabilitation Services (IRRC #2879)

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APR-03-2013 WED 03:18 PM

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APR-03	03:18 PM	97804769	25"	2	FAX TX	OK	837	
TOTAL :						25S PAGES:	2	

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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Angel Cruz, Minority Chairman
 Agency: House Human Services Committee
 Phone 787-1407
 Fax: 780-4769
 Date: April 3, 2013
 # of Pages: 2

RE: Department of Public Welfare's Regulation #14-521: Psychiatric Rehabilitation Service (IRRC #2879)

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