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Ms. Fiona Wilmarth, Director of Regulatory Review  
Independent Regulatory Review Commission  
333 Market Street 14<sup>th</sup> Floor  
Harrisburg, Pennsylvania 17101

October 4, 2018

**Reference: IRRC Regulation # 3160 and DHS Regulation # 14-540, titled "HCBS and Licensing."**

Dear Director Wilmarth,

I am pleased to represent over 100 people and families who use services with Values Into Action-Pennsylvania in writing this letter in support of the IRRC Regulation # 3160 and DHS Regulation # 14-540 titled "Home and Community-Based Services Licensing". This set of regulations will govern the services and supports provided to children and adults with intellectual and developmental disabilities (I/DD) and autism living in the Commonwealth.

Values Into Action-Pennsylvania was founded in 2005 by my husband Paul and me. We had worked together in a traditional service organization and chose to start our own so that we could better include the people and families using services in the design, delivery and evaluation of those services. As an organization we are committed to the separation of housing from services, and so Values Into Action offers services and supports *in partnership with people and their families exclusively in their own homes and communities*. Absolutely no group or segregated buildings or programs. Full commitment to the Home and Community Final Rule. And finally a set of regulations in Pennsylvania that represent the commitment, aspirations and needs of all stakeholders, most importantly people using services and their families.

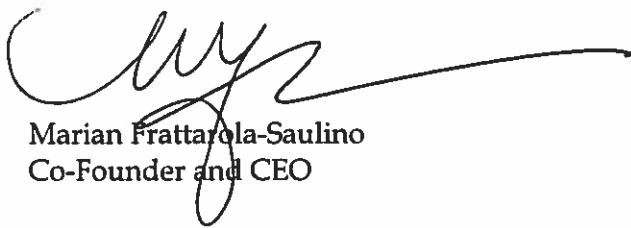
I was honored to be a member of the work group that met over several years under the leadership of Deputy Secretaries Surovec and Thaler. The time and effort put forth by this group was astounding. From the debates and discussion emerged sensible ideas based on the experiences of those dependent on services and those providing services, as well as those with specific areas of expertise including academic, advocacy, government, policy, research, fiscal and administration. The final proposed set of regulations represents a major evolution from the originally-proposed regulations. Again, the amount of stakeholder input and on-going commentary has been reflective of stakeholder participant commitment: competent, responsible and extraordinary.

As an organization that offers support to people intermittently as well as to those with significant medical and behavioral health needs requiring extensive 24-hour support, we find these regulations to be *comprehensive and applicable to all services*. These regulations contain standards for important areas such as individual service planning, the protection of individual rights, staff training, the prevention and management of incidents, and medication administration, as well as the use of restrictive procedures. The breadth and depth of content will ensure the health and safety of each individual using services and supports.

Our organizational philosophy and practices have always reflected, and will continue to reflect and embody the philosophy of Everyday Lives. We *guarantee* our services support community integration of individuals with disabilities, provide opportunities for people to have careers and meaningful work, make their own contributions to their homes and communities, enable and support people to develop and maintain relationships with family and friends, and assure that people are free to exercise their basic rights as citizens. These regulations, unlike the previous, include consistent standards across five sets of regulations (inclusive of four licensing chapters) for physical sites, program design, and service practices that maintain the focus of services on outcomes defined by people with disabilities and their families, i.e. full participation in family and community life. Additionally, these regulations stabilize the program financially and assure reimbursement practices that support robust and relevant community based services, and provide for living wages for direct service practitioners.

In closing, as a provider of individualized services, including Supports Broker services, we believe these five sets of regulations make significant progress in ensuring the success and sustainability of home and community based services for all people, no matter what their support needs, and therefore should be approved.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marian', with a long horizontal flourish extending to the right.

Marian Frattarola-Saulino  
Co-Founder and CEO