

3160

#14-540-3

Kroh, Karen

From: Kroh, Karen
Sent: Wednesday, November 16, 2016 9:19 AM
To: 'Karen Kroh'
Subject: Public Comment-14-540-PAR Comment on Preamble Sub-Heading

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From: Shirley Walker [mailto:Shirley@par.net]
Sent: Tuesday, November 15, 2016 8:56 PM
To: Kroh, Karen
Cc: Rebekah Glick
Subject: Re: Proposed Rulemaking--HCBS and Licensing RE: Duplication

Karen – thank you for your quick response. I understand the potential for conflict and it was a smart move to make them consistent, but I still don't understand how it reduces duplication and why the IRRC has been told that it does. I see duplication being what happens when provider monitoring and licensing overlap, for example. I see duplication being when one entity is required to cover what another entity is already required to cover in licensing or monitoring. I see duplication being when one entity is not prevented from covering what another entity has covered. That is what I see as duplication.

On the question of consistency, can you assure me that there is absolute consistency across the regulations for the 25% (I think that is what Rebekah told me was the percentage you noted today) of regulations that were impacted by changes to bring about consistency among the regulations? One of our members said they weren't identical. Is that so? Were there some variances. I will soon know because of our crosswalks, but it would be helpful if I knew your answer going into the intensive review. Thanks Karen. - Shirley

Shirley Walker President and CEO

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From: "Kroh, Karen" <c-karkroh@pa.gov>
Date: Tuesday, November 15, 2016 at 12:28 PM
To: Shirley Walker <Shirley@par.net>
Subject: Proposed Rulemaking--HCBS and Licensing RE: Duplication

Hello Shirley,

I believe you may be referring to the title in italics on page 7062 of the PA.B “*Reduction of Licensing Duplication*”? This heading was used to describe the compatibility between the four licensing chapters and Chapter 6100 that occurs through the proposal to make the requirements for the six targeted program areas (staff training, rights, incident management, PSP, medication administration, positive intervention) similar across all five chapters (2380, 2390, 6100, 6400, 6500). Redundancy and conflict will likely occur if all five chapters are not revised together as part of this rulemaking.

Best regards,
Karen Kroh

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From: Shirley Walker [<mailto:Shirley@par.net>]
Sent: Thursday, November 10, 2016 3:43 PM
To: Kroh, Karen
Subject: duplication

Karen – can you please identify where duplication has been removed in the regulations? I can see where regulations have been made similar across across regulatory chapters but we are having a hard time finding where “reduction of licensing duplication” has been made. - Shirley

Shirley Walker President and CEO

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