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# 14-540 - (10)

**Kroh, Karen**

**From:** Mochon, Julie  
**Sent:** Monday, December 05, 2016 8:52 AM  
**To:** Kroh, Karen  
**Subject:** FW: AWC 6100 Draft Requirements: Annual Training 6100.143

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-----Original Message-----

**From:** Jaclyn Zacherl Herrmann [mailto:JaclynHerrmann@barberinstitute.org]  
**Sent:** Monday, December 05, 2016 12:38 AM  
**To:** Mochon, Julie  
**Subject:** AWC 6100 Draft Requirements: Annual Training 6100.143

Dear Ms. Mochon,

I am contacting you today regarding the proposed changes to the annual trainings that Agency with Choice is apart of. The purpose of proposed rule making is "to support individuals with an intellectual disability or autism to live in and participate fully in the life of their community, to achieve greater independence and to have the full range of opportunities enjoyed by all citizens of this commonwealth. This proposed rulemaking strengthens community supports to promote person centered approaches, community integration, Personal Choice, quality in support delivery, equity, accountability in the utilization of resources and innovation in service design."

We recommend AWC be excluded from 6100.143. Annual Training. We feel this negatively effects the opportunity for families and participants to have a choice in the type and frequency of training that is needed. This will also greatly effect a person or families participation in choosing to self direct. Agency with Choice is about providing options to the families that they have control over and with these new proposed training requirements there will be a lack of participation due to participants and families not being able to find staff willing to complete 24 hours of training a year.

We recommend keeping the initial orientation requirements and the basic annual trainings with all staff the same. As well as families still having the option of requesting additional staff training as they feel it is necessary. The following are reasons why the proposed trading changes would be a severe hinderance to Agency with Choices:

-There is a big difference that needs to be considered with these changes and that is who it is affecting. Every service attached to this change deals with licensed programs except Agency with Choice. AWC Is an unlicensed program which would not need 24 hours of training a year and only have staff do the required annual trainings.

-AWC & Vendor Fiscal were initially intended to be self-directed options, one with provider assistance and one with state vendor assistance. The service definitions are the same, staff wage scales and unit rates similar but the vendor-fiscal option is excluded from this draft. Support Service Workers work in both models, why would staff trainings have different requirements? This could cause a greater problem than we think as staff tend to get upset if they are required for one part of the job but not the other which leads to them quitting and leaving the families in an awful predicament.

-The current unit rate for services does not support the financial aspect with the increase in training requirements. Currently there are over 550 staff employed with our AWC which would be a significant financial impact. If we had to provide an additional 24 hours of training each year for 550 staff it would cost us \$95,600. The first option to think of would be to Increase the unit rate. This would solve it, but in doing that it would mean a decrease in services for participants in PFDS waiver with families having no control over this. They would have to drop hours and many families cannot afford to lose an hour of staffing.

-These proposed changes would go against AWC Bulletin: 00-08-08 p. 10 b.

c. & d. :

- The orientation and training must be customizable to individual or surrogate needs.

- The option for individuals and surrogates to train their qualified support service workers themselves or participate in qualified support service worker training (initial and ongoing) provided by the AWC FMS provider.

-This proposed change does not support the goal of individuals and families in maintaining choice and individuality in choosing the type and duration of training that is needed. Families do more training in their home as they know the participant the best.

-When there begins to be established mandates, there becomes a barrier to flexibility and choice.

-If the support service worker does not maintain the 24 hours of requirement family therefore causing a great hardship on the family.

-Not every position is the same. Different types of positions may require different training needs. Since AWC is unlicensed it is very different than a licensed program.

For example:

- Respite which could be once a month vs home and community habilitation which could occur on a more frequent basis.

- Companion and respite are just maintaining their health and safety so those staff would not need extensive training.

- some staff only work a few times a year but it is when the family really relies on that staff. With a 24 training requirement many staff will not stay on as they do not think it is worth the hassle if 24 hours of training for a few days of work a year, even though the family really needs them.

I want to thank you for your time and attention to this and I please ask that you consider excluding AWC from the new proposed 24 hour required training. I very strongly feel families will not want to have this change happen as they struggle already to find reliable staff who are compatible with their loved one and adding a new level of commitment makes potential staff think twice about the job.

Thank you for your time

Jaclyn Zacherl Herrmann