

Kroh, Karen #3160

#14-540-88

From: Mochon, Julie
Sent: Monday, December 19, 2016 8:32 AM
To: Kroh, Karen
Subject: Fw: Comments on proposed 6100 Regulations
Attachments: Chapter 6100 Comment Format Philadelphia Traci_1 (12.15.16).xlsx

From: Traci Gardner <TGardner@barberinstitute.org>
Sent: Friday, December 16, 2016 2:05 PM
To: Mochon, Julie
Subject: Comments on proposed 6100 Regulations

Hi Julie, attached you will find comments on the proposed 6100 Regulations. I appreciate the opportunity to provide comments and suggestions on the regulations. If you have any questions or need further information please contact me at 215-871-0731 or via email. Thank you. Traci

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Barber National Institute

<u>Citation</u>	<u>Caption</u>	<u>Discussion</u>	<u>Recommendation</u>
(code, example 2380.33)	(example, Program Specialist)	(basis for discussion and impact if known)	(specific recommendation; revised regulation language)
6100.2 (d)	Applicability	I do not see Older Adult services listed in the exclusions	
6100.52	Rights Team	Is there a specific format in which the Rights Team is to present its recommendations to the PSP team. What if there are no recommendations. What documentation is required of the Rights Team?	Need clarification of requirements. This section seems to cover the same issues covered in Incident Management. Is this a duplicate process?
6100.183 (g)	Additional rights of the individual in a residential setting	What if it is not safe for the individuals door to be locked? What if the individual is non verbal and can't give permission? What if the individual has severe self injurious behavior and staff are unable to enter to help them? Who is authorized and how is that determined?	Replace some of the language with "Individuals should be afforded privacy in their bedrooms and have lockable doors if the individual is able to safety utilize the locks, with a key available to staff in the event that they should need to enter.
6100.183 (h)	Additional rights of the individual in a residential setting	What if the individual is on a very strict diet, is diabetic, has Prader- Willi, etc. ?	While I agree that they should have access to food there needs to be some wording added that pertains to maintaining the health and safety of the individuals
6400.193 (5)	Mechanical restraint	This seems to indicate that devices are not permitted under any circumstances. What if you have doctors order for hand mitts and/helmet to prevent someone from poking their eye out?	There needs to be some language added when it is for safety reasons or ordered by a physician. It is not intended to be restrictive or a restraint but for the safety of the individual.
6100.343(5)	Prohibition of restraints	Includes a statement "as long as the individual can easily remove the device". Being able to remove it may defeat the purpose of its use for safety. I.e.: helmet for seizures, belt for wheelchair	Needs to be reworded to include some flexibility with regards to safety needs.
6100.262(a)	Employment	Doesn't seem to leave any choice for whether or not the individual wants to work.	Add in clarification that it is based on individual choice.

6500.20	Reporting of Unusual Incidents	Shall initiate an investigation of an incident within 24 hours of discovery	ER visits and emergency closures should not always require an investigation unless the reason is unknown. Most times the reason for the ER visit/ hospitalization is clear as is the reason for the emergency closure. What is the purpose of the investigation? Consideration should be given to a DSP who has extensive experience within the agency and has been in a supervisory/management role but does not have a degree. Will there need to be a training plan specific to each individual or an overall training plan for the agency?
6400.44	Program Specialist	Program Specialist Qualifications	
6400.50 (a)	Training plan	Annual Training plan	
6100.226	Documentation of Support Delivery	The Provider shall document support delivery each time a support is delivered.	Clarification is needed as to exactly what documentation is needed. Is "support" referring to an outcome or any support that is provided to the individual?