

Kroh, Karen

3160

#14-540-(93)

From: Mochon, Julie
Sent: Monday, December 19, 2016 8:33 AM
To: Kroh, Karen
Subject: Fw: Regulation No. 14-540 Comments
Attachments: Reg. 14-540 - 2390 Prevocational Services.docx

From: WORKSHOP STAFF <clelianworkshop@aol.com>

Sent: Friday, December 16, 2016 3:14 PM

To: Mochon, Julie

Subject: Regulation No. 14-540 Comments

Attached please find my comments to the above referenced regulation proposals.

Thank you,
Connie Gipson

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IRRC

2016 DEC 20 PM 1:10

Gipson-Comments
Chapter 2390 – Prevocational Services
Connie K. Gipson

Citation: 2390.18. Incident Report and Investigation

**Recommendation: Not all incidents need investigation such as seizures, or unfounded claims.
If a person is believed to be in immediate jeopardy if missing for any period of time it should be reportable immediately as opposed to the 24 hour period.**

Citation: 2390.19. Incident Procedures to Protect the Individual

Recommendation: If all protocol is met, then a correction action plan may not be necessary.

Citation: 2390.21. Individual Rights

Recommendation: The individual should have the right to make their own choices but those choices may not affect other individuals negatively.

Citation: 2390.24. Application laws and regulations

Recommendation:

Citation: 2390.33. Program specialist

Recommendation: Program specialist requirements should align with other chapters and not require specific fields of study. Years of experience should override education from fields currently listed in this section. The program specialist should work in conjunction with direct care workers to provide appropriate activities to individuals.

Citation: 2390.39. Staffing

Recommendation:

Citation: 2390.48. Orientation program

Recommendation: All of the requirements listed are reasonable.

Citation: 2390.49. Annual training

Recommendation: Annual trainings should be focused on the people who working directly with individuals. Perhaps refresher trainings every few years for those who work indirectly with individuals would be more appropriate.

Citation: 2390.124. Content of records

Recommendation: Agree

Citation: 2390.151. Assessment

Recommendation: Agree

Citation: 2390.171. Use of a positive intervention

Recommendation:

Citation: 2390.172. PSP

Recommendation: Agree

Citation: 2390.173. Prohibition of restraints

Recommendation:

Citation: 2390.174. Permitted interventions

Recommendation: Restraints should be used only as a last resort when the individual or another person is at risk of being injured.

Citation: 2390.175. Access to or the use of an individual's personal property

Recommendation: Agree

Citation: 2390.176. Rights team

Recommendation: This seems to be a conflict of interest as well as an imposition on all those involved to be required to meet every 3 months.

Citation: 2390.191. Self-administration

Recommendation: Regulations should match department approved medication administration training.

Citation: 2390.192. Medication administration

Recommendation: Regulations should match department approved medication administration training.

Citation: 2390.193. Storage and disposal of medications

Recommendation: Regulations should match department approved medication administration training.

Citation: 2390.194. Labeling of medications

Recommendation: Regulations should match department approved medication administration training.

Citation: 2390.195. Prescription medications

Recommendation: Regulations should match department approved medication administration training.

Citation: 2390.196. Medication record

Recommendation: Regulations should match department approved medication administration training.

Citation: 2390.197. Medication errors

Recommendation: Regulations should match department approved medication administration training.

Citation: 2390.198. Adverse reaction

Recommendation: Regulations should match department approved medication administration training.

Citation: 2390.199. Medication administration training

Recommendation: Regulations should match department approved medication administration training.

