

Kroh, Karen

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14-540-73

From: Mochon, Julie
Sent: Monday, December 19, 2016 8:29 AM
To: Kroh, Karen
Subject: Fw: Comments regarding Regulation No. 14-540
Attachments: Comments- Ch 2390 Prevocational Services.docx

From: Helen Todd <hct80@hotmail.com>
Sent: Friday, December 16, 2016 10:48 AM
To: Mochon, Julie
Subject: Comments regarding Regulation No. 14-540

Attached are my comments regarding the proposed regulations and possible changes. Please feel free to contact me with any questions or concerns.

Thank you,
Helen Todd

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Todd-Comments Chapter 2390 – Prevocational Services

Citation: 2390.5. Definitions

Discussion:

Recommendation: Clarifications are needed for definitions in order to prevent confusion and misunderstandings (ex: remove “disabled adult” wording since the definitions don’t cover the spectrum of what may be considered a disability)

Citation: 2390.24. Application laws and regulations

Discussion:

Recommendation: This area gives no information as to what “Applicable Laws and Regulations” are. Some laws and regulations are common sense regarding basic human rights. However when such a vague heading is given without explanation, there is much left to interpretation.

Citation: 2390.33. Program specialist

Discussion:

Recommendation: Much of the wording in this section can be deleted as it falls under the category of implementing the ISP (PSP)

Citation: 2390.39. Staffing

Discussion:

Recommendation: No changes

Citation: 2390.48. Orientation program

Discussion:

Recommendation: Wording of what type of information that the orientation program should encompass needs to be refined. Various ancillary staff who do not interact with clients on a daily basis should not be expected to learn to support the individual in maintaining relationships, facilitate community integration or have insight as to job related knowledge and skills.

Citation: 2390.49. Annual training

Discussion:

Recommendation: This section is redundant and should be combined with Section 2390.40 in to one section.

Citation: 2390.124. Content of records

Discussion:

Recommendation: Delete much of the wording in this section relating to specific components of the PSP and streamline it to “PSP documents as required”

Citation: 2390.151. Assessment

Discussion:

Recommendation: No changes

Citation: 2390.171. Use of a positive intervention

Discussion:

Recommendation: Move all definitions in to one section

Citation: 2390.172. PSP

Discussion:

Recommendation: This section should be combined with Section 2390.173 in order to have continuity of thought.

Citation: 2390.173. Prohibition of restraints

Discussion:

Recommendation: Change wording of “manual restraint” to “physical restraint”. Move definitions to one section.

Citation: 2390.174. Permitted interventions

Discussion:

Recommendation: Move definitions to one section.

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

Discussion:

Recommendation: No changes.

Citation: 2390.176. Rights team

Discussion:

Recommendation: While the concept of a “Rights Team” is a good one, there is concern that the need to investigate each “alleged” incident may result in an abundance of unfounded accusations. Example: a client alleges that a staff member/coworker interfered with their rights and the staff/coworker was absent on the day of the allegation. This could delay the investigation of an actual incident. Also confusing is the need for the team to meet at least once every 3 months. There should be an “end date” when the investigation is closed to the satisfaction of the individual and family/caregiver. The individuals involved should also have the option of an independent investigator.

Citation: 2390.191. Self-administration

Discussion:

Recommendation: No changes

Citation: 2390.192. Medication administration

Discussion:

Recommendation: Oral, topical, drop medications and auto-injector devices should be given by a person who has taken the Medication Administration Course. Further in-depth instruction should be provided to anyone who administers insulin injections or medications through a route other than orally.

Citation: 2390.193. Storage and disposal of medications

Discussion:

Recommendation: Medications should not be removed from containers until time to dispense. This can lead to errors or accidental ingestion. Subsections e through i should be deleted since many of these concepts have already been addressed.

Citation: 2390.194. Labeling of medications

Discussion:

Recommendation: No changes.

Citation: 2390.195. Prescription medications

Discussion:

Recommendation: Once again, much of this information is common sense. The section should be streamlined to address the most important points regarding the use of a prescription.

Citation: 2390.196. Medication record

Discussion:

Recommendation: As written, the current information that is required to be on a medication log seems excessive. While a form like this may work in a facility providing care for many individuals, it may not be applicable in a life sharing situation.

Citation: 2390.197. Medication errors

Discussion:

Recommendation: No changes.

Citation: 2390.198. Adverse reaction

Discussion:

Recommendation: No changes.

Citation: 2390.199. Medication administration training

Discussion:

Recommendation: While all staff should be familiar with the use of an auto-injector device, it is concerning that a caregiver/staff/person should be required to take an approved Medication Administration Training course in order to dispense this medication. In an anaphylactic situation, time is of the essence and a delay while a “Med-trained” person is located could have devastating results.

cc: Nancy Thaler, Deputy Secretary, Department of Human Services, ODP