

Kroh, Karen # 3160

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From: Mochon, Julie
Sent: Monday, December 19, 2016 8:31 AM
To: Kroh, Karen
Subject: Fw: 6100 regulation Comments
Attachments: Proposed 6100 regulation Comments (002).doc

From: Chuck Scott <Chuck.Scott@hrcinc.org>
Sent: Friday, December 16, 2016 1:08 PM
To: Mochon, Julie
Subject: 6100 regulation Comments



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Proposed 6100 Regulation Comments

Made by Chuck Scott/Human Resources Center Inc.
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Scott-Proposed 6100 Regulation Comments

Comments/suggestions underlined and italicized

6100.141 Annual Training Plan

Annual training plan needs to be general enough to provide training to staff in multiple programs with multiple consumers.

Annual training plan needs to focus on Core Competencies and required trainings and then be flexible enough to add trainings based on consumer/program needs throughout the year.

6100.142 Orientation program

I suggest keeping the language "prior to working alone with individuals" not changing it to "prior to interacting with" (as PAR suggested). New staff being able to talk with individuals they will be working with and building relationships is very important. Being able to do this in a supervised area before and as they are being trained is important.

6100.143 Annual Training

a. (24 hr. Training)

Including individuals that provide Home and Community-based Services in the 24 hr. requirement could exclude many of the people who are currently proving supports.

b. (12 hr. training for Management/fiscal/ancillary staff annually)

Initial training for staff will insure new staff understand consumer rights, person centered supports, recognizing/reporting abuse and incident management. Ongoing modeling from DSP's, Coordinators and Supervisors will then reinforce initial training of Managers/fiscal/ancillary staff that are not responsible for consumers.

12 hours of Annual training for Management/Fiscal/ancillary staff would be difficult to accomplish.

6100.463 Storage and disposal of medications

e. Epinephrine auto-injectors shall be kept easily accessible at all times

I suggest including rescue inhalers for asthma and Emergency PRN for severe Seizures



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2380.21 Rights

U. (provider must inform consumers of rights annually and document)

Annual PSP Meeting should include informing consumers of their rights. (documented by supports coordinator)

2380.36 Emergency training

(g). (c) Heimlich techniques

Recommend changing wording to "first aid for choking" to reflect changing procedures

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