

Kroh, Karen

# 3160

#14-540-(68)

**From:** John Phillips <jphillips@sphs.org>  
**Sent:** Friday, December 16, 2016 2:15 PM  
**To:** Kroh, Karen  
**Subject:** FW: Comments on 2380 and 6100  
**Attachments:** Regulations comments Dec 12, 2016 rev Dec 16.docx

Karen,  
Sorry, forgot to include you on the initial send list.  
John

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**From:** John Phillips  
**Sent:** Friday, December 16, 2016 2:12 PM  
**To:** 'jmochon@pa.gov' <jmochon@pa.gov>  
**Cc:** 'epic@wpa.net' <epic@wpa.net>  
**Subject:** Comments on 2380 and 6100

Julie,  
In the attachment, please find my comments relative to Chapter 2380 and Chapter 6100. Please feel free to contact me if you have any questions or concerns.  
Thank you,  
John

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The following comments are in regard to **6100 regulations and Chap. 2380** as presented November 5, 2016.

While there are some concerns prior to my given starting point, I begin my comments with 2380.182 as this seems to most directly affect my work and my program.

2380.182(5)(c): This, as written, seems to suggest that the program specialist has more direct involvement in the development of the PSP while in fact, unless they are the team lead, do not have such authority.

2380.184(2) It says "Enable the individual to make informed choices", we can't guarantee "enabling". We can try but can't assure it based the individual's comprehension ability.

It might be wise to have some discussion regarding "PSP Process" 2380.184(3) ". . . supports are delivered in a manner reflecting individual *preferences*. . ."; and more particularly the following two: "Content of the PSP" 2380.185(3) and "Content of the PSP" 6100.223.11. The former stating "The individual's goals and preferences related to *relationships, community participation, employment, income and savings, health care, wellness and education.*" And the latter saying "Active pursuit of competitive, integrated *employment as a first priority*, before other activities or supports are considered." Prioritizing the 6100 position may unfairly imbalance needs and preferences of the individual. Employment is an important cultural value that may not be the first priority value of the individual. It may not be their value at all. It may just be ours. There may also be other priorities not reflected in 185(3). A well-rounded service should not make "employment embracing" as the requirement to cross the threshold, in either direction. For many folks we serve, attending a 2380 program **IS** community participation. There is acceptance, no judgement, no criticism. There are multiple opportunities. Having to be in "the community" for increasing (at perhaps frighteningly grand percentages) of time, though not mentioned in 2380 or 6100 that I can find, could burden the individual, not yet mentioning the program, to be part of activities they do not wish to be part of. We are limiting their personal development by forcing a particular part of someone's agenda. We are building a wall and making them pay for it.

2380.184(8) Regarding "method for individual to request updates", are there any formalized thoughts on the "method" for the individual to do this?

2380.185(6) Can variability in, say, week to week occur in the schedule based on need/preference?

2380.185(8) I kind of like this. The "continued" part seems to allow for even if there are NOT new but only "continued community participation." Rates and 'depth' of participation vary according to person.

2380.185(b)10) Would this require a restrictive procedure and/or does this *mean* restrictive procedure.

Note that the comments contained herein reflect my own personal concerns and may not necessarily reflect those of the agency I work for.

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