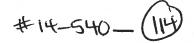
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Julie Mochon,

Department of Human Service Review Commission

Office of Developmental Programs

625 Forster Street, Room 501

Harrisburg, PA 17120

December 15, 2016

Subject:

Proposed Regulations -. PA Bulletin, Doc. No. 16-1934

I welcome the opportunity to comment on the regulations proposed in PA Bulletin, Doc. No. 16-1934.

I respectfully submit the attached comments for your consideration.

If additional information is required, I can be reached via phone (814) 878-4091 or email tpaterniti@barberinstitute.org.

Respectfully,

Thomas E. Paterniti

Operational Improvement Manager

cc Jennifer L. Kennedy

Barber National Institute

Citation	Caption	<u>Discussion</u>	Recommendation (specific recommendation; revised regulation	Name
(code, example 2380.33) 6100.45 (b)(1)	Quanty Managament		language) Remove the requirement for analysis of individual outcomes based on the PSP.	Barber National Institute/Thomas Paterniti
2380.33(3) 2390.33(3)	Program Specialist	shall be responsible for providing and supervising activities for the individuals". On a day to day basis the PS does not directly provide or supervise activities. The PS facilitates	Change verblage to : supporting activities provided for the individual.	Barber National Institute/Thomas Paterniti
6100.183(a)	Additional rights of the Individual	through program staff. An individual has the right to receive scheudled and unscheduled visitorsat any time. This language may not be practical and may infringe on the rights of other individuals.	Remove "at any time"	Barber National Institute/Thomas Patemiti
6100.261	Access to the community	Providing ongoing opportunities and support to participate in community activities of the individual's choice and maintain appropriate staffing levels could be a challenge.	Include language "within reason".	Barber National institute/Thomas Paterniti
6100.441(c)	Request for and approval of changes	The program capacity may not be exceeded. As written this would not allow the use of "excess" capacity for respite. Excess being defined as occupancy capacity vs. program approved capacity	include language addressing excess capacity.	Barber National Institute/Thomas Paterniti
6100.483 6100.466(c) 2380.126(c)	Title of a residential building Medication records	The title of a debt free building owned by an enrolled provider shall remain with the enrolled provider. Medication refusal shall be reported to the prescriber within 24 hours. This requirement is cumbersome and could lead to misreporting of	need to be satisfied. Remove the requirement to notify prescribers within 24 hours of any medication refusal.	Barber National Institute/Thomas Paterniti Barber National Institute/Thomas Paterniti
2390.196 (c)		medication refusals by staff.		