

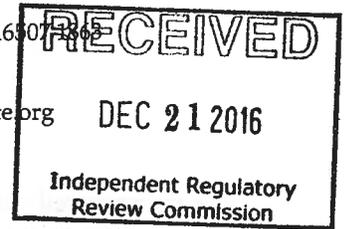
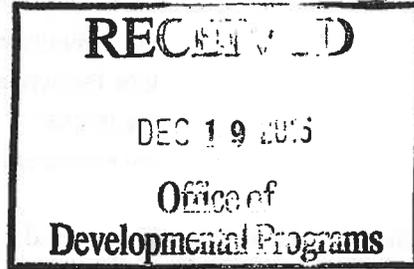


Barber National Institute

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Dr. Gertrude A. Barber InHome Services, Inc.
100 Barber Place
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Dear Ms. Mochon,

I am contacting you regarding the proposed changes to the annual trainings in the 6100 regulations that Agency with Choice (AWC) is a part of. Over the years of working for Agency with Choice I have seen many changes and many changes that continue to take away from the part of the service that is aimed at helping our individuals and families and making their lives easier. While we fully agree that training is extremely important, we also feel that staff get better training in the homes of the individuals with the family members who know more about the individual than any of us ever will. I have worked for so long for Agency with Choice that I care deeply about my families and only want to make the services we provide as less taxing on them as possible. Good staff are far and few between so when a family finds one we want to do whatever it takes for them to maintain that staff. My fear is that this change will do everything that we don't want it to do which is turn staff away.

We recommend Agency with Choice be excluded from 6100.143. Annual Training. We feel this negatively affects the opportunity for families and participants to have a choice in the type and frequency of training that is needed. This will also greatly effect a person or families participation in choosing to self-direct. Agency with Choice is about providing options to the families that they have control over and with these new proposed training requirements there will be a lack of participation due to participants and families not being able to find staff willing to complete 24 hours of training a year. Most of our staff have other jobs and are unable to get off that amount of time to complete this, causing them to resign. We recommend keeping the initial orientation requirements and the basic annual trainings with all staff the same, as well as families still having the option of requesting additional staff training as they feel it is necessary.

The following are reasons why the proposed training changes would be a severe hindrance to Agency with Choices:

-There is a big difference that needs to be considered with these changes and that is who it is affecting. Every service attached to this change deals with licensed programs except Agency with Choice. AWC is an unlicensed program which would not need 24 hours of training a year and only have staff do the required annual trainings.

-AWC & Vendor Fiscal was initially intended to be self-directed options, one with provider assistance and one with state vendor assistance. The service definitions are the same, staff wage scales and unit rates similar but the vendor-fiscal option is excluded from this draft. Support Service Workers work in both models, why would staff trainings have different requirements? This could cause a greater problem than we think as staffs tend to get upset if they are required to do something for one part of the job but not the other, which leads to them quitting and leaving the families in an awful predicament.

-The current unit rate for services does not support the financial aspect with the increase in training requirements. Currently there is over 550 staff employed with our AWC which would be a significant financial impact. If we had to provide an additional 24 hours of training each year for 550 staff it would cost us roughly \$95,600. The first option to think of would be to Increase the unit rate. This would solve it, but in doing that it would mean a decrease in services for participants in PFDS waiver with families having no control over this. They would have to drop hours and many families cannot afford to lose an hour of staffing.



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-These proposed changes would go against AWC Bulletin: 00-08-08 p. 10 b. c. & d. :

- The orientation and training must be customizable to individual or surrogate needs.
- The option for individuals and surrogates to train their qualified support service workers themselves or participate in qualified support service worker training (initial and ongoing) provided by the AWC FMS provider.

-This proposed change does not support the goal of individuals and families in maintaining choice and individuality in choosing the type and duration of training that is needed. Families do more training in their home as they know the participant the best.

-When there begins to be established mandates, there becomes a barrier to flexibility and choice.

-If the support service worker does not maintain the 24 hours of required annual training, which staff won't be able to work with the family therefore causing a great hardship on the family.

-Not every position is the same. Different types of positions may require different training needs. Since AWC is unlicensed it is very different than a licensed program.

For example:

- Respite which could be once a month vs home and community habilitation which could occur on a more frequent basis.
- Companion and respite are just maintaining their health and safety so those staff would not need extensive training.
- Some staff only work a few times a year but it is when the family really relies on that staff. With a 24 training requirement many staff will not stay on as they do not think it is worth the hassle if 24 hours of training for a few days of work a year, even though the family really needs them.

I want to thank you for your time and attention to this and I please ask that you consider excluding AWC from the new proposed 24 hour required training. I very strongly feel families will not want to have this change happen as they struggle already to find reliable staffs that are compatible with their loved one, and adding a new level of commitment makes potential staff think twice about the job.

Thank you for your time and attention to this.

Sincerely,

Jaclyn Zacherl, M.A.
AWC Lead Liaison