

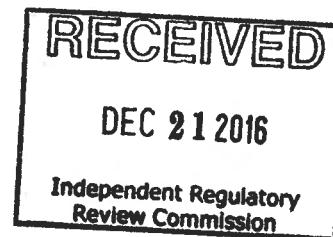
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#14-510-162

**Kroh, Karen**

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**From:** Mochon, Julie  
**Sent:** Tuesday, December 20, 2016 8:44 AM  
**To:** Kroh, Karen  
**Subject:** FW: comments  
**Attachments:** Comments on 2380 Regulations.docx



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**From:** Damon Krynicki [<mailto:d.krynicki@mcguirememorial.org>]  
**Sent:** Monday, December 19, 2016 4:25 PM  
**To:** Mochon, Julie  
**Subject:** comments

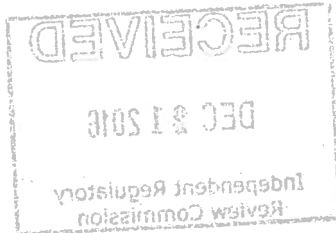
Attached are my comments on the proposed 6100 reg changes.

*Damon A. Krynicki, M.Ed.*  
*EOC Director*  
*McGuire Memorial*  
*543 Moon Clinton Road*  
*Moon Twp., PA 15108*  
*(P)412-604-5371*  
*(F)412-604-5375*

*Our Mission Statement: "McGuire Memorial is a co-sponsored ministry of the Felician Sisters of North America, Our Lady of Hope Province and the Diocese of Pittsburgh. Forming a joy filled community of Christian believers, McGuire Memorial is committed to providing comprehensive services to people with mental and physical disabilities that may include complex medical conditions, and offers supportive services to their families and care givers."*

*Our Five Core Values: Justice and Peace, Respect for Human Dignity, Compassion, Transformation, and Solidarity with the Poor.*

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 Subject: [illegible]  
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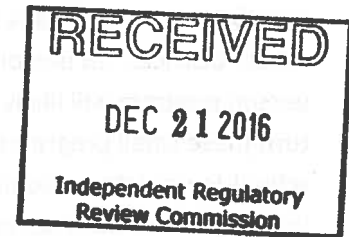
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**Julie Mochon, Human Service Program Specialist Supervisor**  
**Office of Developmental Programs**  
**Room 502, Health and Welfare Building**  
**625 Forster Street**  
**Harrisburg, PA 17120**  
**[jmochon@pa.gov](mailto:jmochon@pa.gov)**



**Reference Regulation No. 14-540**

Dear Julie Mochon,

Please accept my attached comments, suggestions, and recommendations for the proposed 6100 regulatory changes and implementations as they pertain to 2380 day programs. Thank you.

Thank you,

Damon A. Krynicki, M.Ed.  
Director McGuire Memorial Employment Option center

Comments on 2380 Regulations:

**2380.17 – regarding the initiation of an investigation for all incidents listed in subsection (a):** requiring an investigation of all hospital admissions, ER visits, and injuries requiring treatment beyond first aid, and emergency closures is not practical. In a facility with individuals who have compromised health these investigations could happen often and may not warrant the need. There is no question that some incidents need to be investigated but requiring all 15 items on the list to be investigated is not a good use of already scarce resources.

**6100.446 Facility characteristics relating to size of the facility for 2380 licensed facilities:** Putting a 15 person limit on 2380 facilities is a risky idea that will undoubtedly leave many adults with disabilities sitting at home and parents and guardians struggling to find safe places for their loved one to be during the day while they work. While getting more access to the community and employment is important I think that people tend to be misled on the actual numbers of adults who need day services. As a day program director I routinely give tours to adults, families, and school districts interested in future placements and the number annually is much more than 15. A 15 individual maximum roster makes little sense other than it would be easier to run for someone in a management position but would a program that small even have the capacity to generate enough revenue to sustain? I don't see how, the current rates won't support the resources needed. Once people can't get into these small 15 people

"focus group" programs because they are full then they will sit at home or be placed with a family member or glorified baby sitter. Another unforeseen result of this regulation would be the effect on school districts. 15 person programs will leave no room for transitioning of school students. A 15 person program will likely not take part-time individuals because of the revenue needed to operate...in turn these small programs will be full and schools will have nowhere to send graduating students for school-to-work transitioning or future placement. The schools will be forced to abandon specific training for the most severe of individuals and again....they will be sitting at home.