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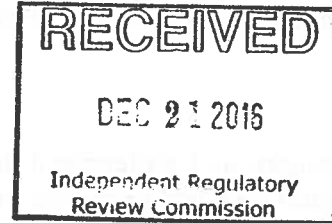
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Kroh, Karen

From: Mochon, Julie
Sent: Tuesday, December 20, 2016 8:36 AM
To: Kroh, Karen
Subject: FW: Comments regarding proposed rule making re: 46 Pa.B. 7061

From: Wayne David Schmoyer, PsyD [<mailto:4chandre@gmail.com>]
Sent: Monday, December 19, 2016 12:47 PM
To: Mochon, Julie; Wayne David Schmoyer, PsyD
Subject: Comments regarding proposed rule making re: 46 Pa.B. 7061



December 19, 2016

Attention of: 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

Dear Ms. Mochon,

I am writing regarding the proposed rule making referenced in Bulletin number 00-16-07 - I am the President and CEO of Riverside Associates PC, one of the Behavior Support and Home Based Supports providers in PA. Also, I have been involved with the MH/ID service system in Dauphin and Cumberland counties for 35 years. I have several urgent concerns about the proposed rulemaking:

1. The changes being proposed are complex and I feel we have not had sufficient time to examine them and consider their impact on our clients and consumers [and providers]; I am requesting that the comment period be extended to allow providers more time to review and comment.
2. The timetable for implementation of the changes is too short; we will need more time to implement the many changes that will be required and a deadline of July 1 2017 is too soon. I have also heard this concern from other agencies.

3. I am concerned that the changes will amount to rolling back the service delivery system to a former condition in which residential providers had the primary responsibility for behavioral interventions and were not equipped to do this effectively; that was one reason there used to be core-teams to consult with agencies about behavioral interventions.

The current system of behavioral supports from private providers does a good job of providing for expert behavioral interventions to persons who need these, and they can be obtained without any need to rely on the agency providing their residential care. I feel that giving consumers with Intellectual disabilities fewer options by requiring them to receive all their behavioral services through the place they reside is going to open them up to inadequate care for their needs.

4. The changes, as I understand them at this point, will require a disruption in the current communication and authorization linkages between referral sources—often Support Coordination Units—and providers such as ourselves. I have serious concerns that this disruption will result in interruptions of services already underway that are already supporting consumers with active behavioral concerns.

I would like more time to comment in more detail. If you wish to call me to discuss any of my comments please call 717-228-5454.

Thank You for your time. Yours,

Wayne David Schmoyer, PsyD / Licensed Psychologist

CEO / Riverside Associates, P.C.

<http://www.riversideassociatespc.com/>

<http://www.riversideassociatesbs.com>

"Freewill Need Not Be Self-Will."

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