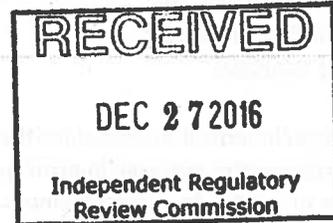


Kroh, Karen **#3160**

#14-540-215

**From:** Mochon, Julie  
**Sent:** Tuesday, December 20, 2016 2:13 PM  
**To:** Kroh, Karen  
**Subject:** FW: 2390 comments

**From:** Pat McGonigle [mailto:pmcgonigle@apspackage.com]  
**Sent:** Tuesday, December 20, 2016 2:07 PM  
**To:** Mochon, Julie <jmochon@pa.gov>  
**Subject:** 2390 comments



Julie Mochan,

I have the following comments regarding the 2390 regulations:

Pre-Vocational training should be about WORK. If we want to train folks to be independent in a competitive job, 2390 programs should be modeled more after employment than traditional adult day programs.

In 2011 the 2390 regulations were revised and added significant responsibilities to the Pre-vocational Program Specialists including but not limited to:  
numerous additions to the annual assessment requirement (most having little to do with vocational training),  
additional communication documentation requirements (printing emails to document distribution of assessments),  
collecting physicals (which we are not in control of getting),  
writing lifetime medical histories (which we can only obtain from other sources) and  
composing Social, Emotional, Environmental Support Plans (which we may not be qualified to do);  
All of that and more were added without reducing the ratio from 1:45 or providing additional funding. This ultimately served to maximize the amount of time spent on paperwork instead of the consumer. In 5-years our consumers are not going to remember or care what a beautiful monthly or quarterly report said, but they will remember when the PS taught them how to use a tape gun, paper shredder, pallet jack or any numerous other skills that can be used in actual competitive employment. Programs licensed under chapter 2380 have similar requirements but have a 1:30 ratio for Program Specialists. All of these responsibilities were, previous to 2011, not 2390 requirements.

Another change made in 2011 was the removal of the regulation that required 20% remunerative activity. Instead of removing it from Pre-vocational programs, it should have been significantly increased. Workshops that don't work do not make sense. People who attend 2390 programs want to work and want to make money. The regulations should support that.

I respectfully request that ODP consider revisiting these 2011 changes and endeavor to compose the 2390 regulations to reflect the values and expectations of community integrated competitive employment.

Thank you for your consideration,  
Patricia McGonigle

Patricia McGonigle, GM  
950 Pembroke Road  
Bethlehem, PA 18015

#3100



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