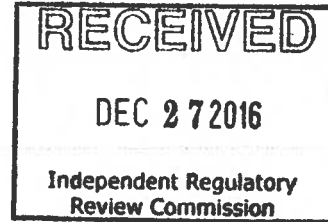


3160

14-540 - 217

Kroh, Karen

From: Mochon, Julie
Sent: Tuesday, December 20, 2016 2:13 PM
To: Kroh, Karen
Subject: FW: Regulation Comments - MCAR
Attachments: MCAR Regulation Letter.pdf; 2380 FORM.docx; 2390 FORM.docx; 6100 FORM.docx; 6400 FORM.docx; 6500 FORM.docx



From: Amanda M. Nicol [mailto:anicol@mercerarc.org]
Sent: Tuesday, December 20, 2016 2:03 PM
To: Mochon, Julie <jmochon@pa.gov>
Cc: Diane M. O'Rourke <dorourke@mercerarc.org>; Shirl A. Meyers <smeyers@mercerarc.org>; Lyndsey Q. Vogan <lvogan@mercerarc.org>
Subject: Regulation Comments - MCAR

Dear Ms. Mochon,
Please find attached a formal letter from MCAR (The Arc of Mercer County) along with regulation comments for the 6100 Regulations. Also included are 2380, 2390, 6400 and 6500 comments.

We thank you for offering us the opportunity to provide feedback and recommendations during this critical process.

Sincerely,
Amanda Nicol



For people with intellectual
and developmental disabilities

Amanda M. Nicol
Chief Operating Officer
MCAR, Inc.
850 N. Hermitage Road
Hermitage, PA 16148
T 724-981-2950 x219
F 724-981-1877
www.mercerarc.org

3160

3160

Received

Monday, 14 Dec 2015 10:53 AM
From: [illegible]
Subject: [illegible]

RECEIVED
DEC 2 2015
Independent Regulatory
Review Commission

From: [illegible]
Sent: Monday, December 20, 2015 12:11 PM
To: [illegible]
Subject: [illegible]

[Faint, mostly illegible text, possibly a letter or report body]

[Faint text, possibly a signature or name]

[Faint text, possibly a footer or contact information]





Achieve with us.

Dec. 20, 2016

Ms. Julie Mochon, Policy Specialist
Office of Developmental Programs
Room 501, Health & Welfare Building
Harrisburg, PA 17120

MCAR, Inc.
850 N. Hermitage Road
Hermitage, PA 16148

T 724-981-2950
F 724-981-1877
www.mercerarc.org

Diane M. O'Rourke
Chief Executive Officer

RE: Comments on Home and Community-Based Supports and Licensing Proposed Rulemaking

Dear Ms. Mochon:

The Arc of Mercer County (MCAR) is a county-wide, nonprofit organization that provides advocacy and services for persons with intellectual and developmental disabilities and their families. MCAR was established in 1952 and we are a member of The Arc of Pennsylvania and The Arc of The United States. Local chapters like ours provide critical services and advocacy for individuals with intellectual and developmental disabilities and their families in our community and across our region.

Thank you for the opportunity to comment on the Home and Community-Based Supports and Licensing proposed regulations. MCAR appreciates The Office of Developmental Program's commitment to stakeholder input. Comments included in this communication are driven from our main goal to empower those in our society to live their fullest, everyday life possible.

Overall Comments:

- We applaud ODP for embarking on the difficult task to encompass the 2380, 2390, 6400 and 6500 with the new 6100 regulations. We also appreciate the transparency with which this process has been approached, defining workgroups to participate in the development of new regulations and waiver definitions.
- While the new regulations are far reaching, there is an unstated administrative cost that will be absorbed by provider agencies, already encountering unreimbursable costs from eliminated activities.
- Our goal is to provide an everyday life for our individuals, and these regulations might be better served by looking at critical activities for individuals rather than over-burdening monitoring and compliance. The result could be higher outcomes for all individuals served by providers.
- We believe in restraint-free environments and support ODP's move toward the same, only using restraints when an individual displays significant harm to themselves or others.

Again, thank you for the opportunity to provide critical feedback to the Office of Developmental Programs.

Sincerely,

Diane M. O'Rourke
CEO

Vocational Habilitation
MCAR Greenhouse
Handmade Crafts and Gifts
Subcontract Employment
Furniture Refinishing
Janitorial Services
Job Task Training

Community Employment
Job Placement
Job Support
Job Coaching

Day Services
Older Adult Day Center
Adult Daily Living Skills Training
Social Skills Building
One-to-One Staffing
Social Therapeutic Activities

Residential Services
Group Homes
Medical Support Homes
Behavioral Support Homes
Life Sharing
Respite Care
Supportive Living
Supported Living
In-Home Services

Habilitation Aide Services
Individual Supports
Companion Services

Participant Directed Services/AWC
Home & Community Habilitation
Supported Employment
Homemaker/Chore
Supports Broker
Companion
Respite

Youth Services
Education Advocacy and IEP Support
Fun in the Sun Summer Camp
Social Group for Young Adults
with High Functioning Autism
and Asperger's Syndrome

