14-540 (256)

## Kroh, Karen

From:

Mochon, Julie

Sent:

Tuesday, December 20, 2016 4:03 PM

To:

Kroh, Karen

Subject:

FW: On Behalf of Kristy Buczynski- Reference# 14-150

**Attachments:** 

6100 Reg comment submission.docx

From: Tanika Canady [mailto:tcanady@emmauspgh.org]

Sent: Tuesday, December 20, 2016 3:53 PM

To: Mochon, Julie

Cc: kbuczynski@emmauspqh.org

Subject: On Behalf of Kristy Buczynski- Reference# 14-150

Hello Ms. Mochan:

Attached, please find Kristy Buckzynski's Regulation Comments for Submission.

RECEIVED

DEC 2 72016

Independent Regulatory Review Commission

Sincerely,

Tanika L. Canady

Program Administrative Assistant

**Emmaus Community of Pittsburgh** 

A Community that Serves Persons with Intellectual Disabilities and Promotes Public Awareness of Their Needs

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Independent Regulatory Review Commission

Kristy Buczynski

Residential Program Manager/ Program Specialist

Emmaus Community of Pittsburgh

2810 Carey Way

Pittsburgh, PA 15203

December 20, 2016

Ms. Julie Mochon

Human Service Program Specialist Supervisor

Office of Developmental Programs

Room 502, Health and Welfare Building

625 Forster Street

Harrisburg, PA 17120

Reference Reg. No. 14-540

Dear Ms. Mochon:

Thank you for the opportunity to submit comments on the proposed Chapter 6100 Regulations, "Support for Individuals with Disabilities or Autism." I have been employed in this field for fourteen years and am excited to be a part of the process.

Currently I work for the Emmaus Community of Pittsburgh. We serve individuals with Intellectual Disabilities and Autism and take great pride in providing the highest quality of care. This experience to voice our opinions based on experience and knowledge is greatly appreciated. The Emmaus Community is looking forward to assisting the Office of Developmental Programs live out the mission of providing individuals with the best quality of care and continue to help them be integrated community and reach their goals to be health, successful, and satisfied with their life.

Sincerely,

Kristy Buczynski

Residential Program Manager/ Program Specialist

Emmaus Community of Pittsburgh

## Regulation Comments for Submission:

#### 1. 6100.571 Fee Schedule Rates:

Moving to flat fee schedule from a cost base, how will we continue to have qualified staff? Consideration for educated staff who have many responsibilities need to be taken into account. We want to provide the highest quality of care, but or staff's income is not justifying all of the work they do on a daily basis.

# 2. 6100.141 Annual Training:

(b) The Annual Training Plan should not include the Orientation Plan. Orientation refers to information given upon hire, and therefore by the Annual Training Date, an employee should not focus on what they learned upon hire, but a discussion of new information and/or review of what they are doing daily only to strengthen their knowledge.

## 3. 6100.226 Documentation for Service Delivery:

(c) Daily documentation would be a lot for each individual resident. Our staff are already documenting everyone's day (activities, behaviors, ADL's), to have to do these for each individual person for a staff that is already consumed with multiple tasks (healthcare maintenance, medication administration, community integration, goal documentation), daily noted for each is extreme.