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#14-540-212 (211)

Kroh, Karen

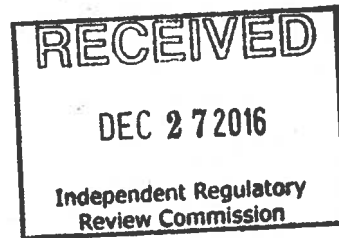
From: Mochon, Julie
Sent: Tuesday, December 20, 2016 2:37 PM
To: Kroh, Karen
Subject: FW: Comments on Proposed Rulemaking 2380, 2390 and Chapter 6100 Regulations
Attachments: 2016-12-20 Comments on Proposed Rulemaking.docx

From: Barry Bussell [<mailto:bbussell@sparcphilly.org>]
Sent: Tuesday, December 20, 2016 2:25 PM
To: Mochon, Julie <jmochon@pa.gov>
Subject: Comments on Proposed Rulemaking 2380, 2390 and Chapter 6100 Regulations

Attached, please find my comments.

Barry T. Bussell
SpArc Philadelphia
2350 W. Westmoreland Street
Philadelphia, PA 19140

P: 215.229.4550 ext. 154
F: 215.821.6972
E: bbussell@sparcphilly.org



Comments on Proposed Rulemaking 2380, 2390 and Chapter 6100 Regulations

I work for SpArc Services in Philadelphia. I have worked in the field of vocational rehabilitation for over 34 years. Based on discussions with my co-workers at SpArc the following are our concerns with the proposed changes to the regulations:

2380.156, 2390.176 - Rights Team

We recommend that the requirement to create a Rights Team be removed from the regulations.

This seems redundant since we are already held to the incident management regulations as well as to the regulations around an individual's civil rights. Since a rights violation is already classified as an incident, (2380.17 (a) 15), it is already subject to documentation, dissemination of the documentation, analysis, and corrective action.

6100.461-6100.469, 2380.121-2380.129, 2390.191-2390.199, 6400.161-169 and 6500.131-6500.139 – Medication Administration

We recommend that the high level of detail in these very prescriptive regulations be removed or, at least, pared down.

We believe that less detail is preferable given the rate at which technology and the medications change. We suggest that all activities related to medication administration should refer to the Office of Developmental Programs' Approved Medication Administration Training.

6100.446 – Size of Facility

Nowhere in the Final Community Rule does it specify an absolute cap on program size. We recommend that this requirement is eliminated from the regulations.

We are concerned about the need for higher staffing levels and the additional costs associated with the smaller program size. The move toward community based services will be difficult and scary for many of the people we serve. There will be a greater need for people to have the support of their co-workers and friends during the time they are working in the facility.

6100.571(c) – Fee Schedule Rates

We are looking for a clear commitment to fund the many changes and new requirements the Commonwealth is suggesting. Without adequate funding the quality of the service we currently provide will suffer.

Barry T. Bussell

Director; UniqueSource Partnership

SpArc Services

Philadelphia