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14-540-300

**Kroh, Karen**

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**From:** Mochon, Julie  
**Sent:** Wednesday, December 21, 2016 8:59 AM  
**To:** Kroh, Karen  
**Subject:** FW: My comments regarding potential 6100 regulations

-----Original Message-----

From: Kathy Gingerich [mailto:KGingerich@arcofdc.org]  
Sent: Tuesday, December 20, 2016 11:59 PM  
To: Mochon, Julie  
Subject: My comments regarding potential 6100 regulations

I work as a advocate at the Arc of Dauphin County and I am the parent of young man with intellectual disabilities and autism. I appreciate the Office of Developmental Programs efforts to align the regulations and licensing requirements. I am glad to see the sections on regulatory waiver ( 6100.43) and innovation project (6100.44) included. I believe this will allow more flexibility to respond to individual's unique needs. I also feel an greater emphasis on the use of technological communication devices ( 6100.50) will give voice to many who have not been able to communicate before.

I am concerned that some of the proposed regulations are not going to streamline processes but actually become overly burdensome for small providers. I feel excessive documentation and heavier administration costs will take away from direct care/ person directed services.

6100.143 The increase in annual training and orientation (24 hours) has been expanded to include fiscal, and ancillary staff. Since in most agencies these staff have no interaction with the individuals their agency serves that is an excessive amount of training to regulate.

6100.47 Criminal History Check. Requiring criminal history checks for all volunteers discourages community involvement. Is there a distinction between a volunteer providing HCBS and a friend/ volunteer taking an individual out in the community?

6100.221 Why change the ISP to a PCP? Families find the acronyms VERY confusing. The fact that acronyms change every few years but the service/ form/ department/ agency etc. does not, only makes it more frustrating. If you are changing the name then get rid of the unfriendly ISP formate and replace with a truly person-centered form!

6100.52 An individual's rights should not be restricted due to lack of staff. This happens very frequently. Individuals are kept from going out in the community because a housemate doesn't want to leave the house and there is only one staff on duty.

My final thought: As we strive toward an everyday life for all the individuals we work with I feel there should be a paring of rights with responsibilities. We are setting individuals up for the false belief that there are no consequences for most of their actions and that is not an everyday life.

Kathy Gingerich  
The Arc of Dauphin County

