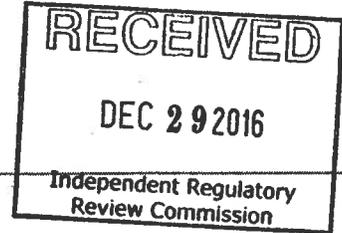


3160

14-540 (334)

Kroh, Karen

From: Mochon, Julie
Sent: Tuesday, December 20, 2016 3:13 PM
To: Kroh, Karen
Subject: FW: 6100 Comments
Attachments: Cover Letter.pdf; 6100 Comments.docx



From: Norman Ressler [<mailto:nressler@friendshipcommunity.net>]
Sent: Tuesday, December 20, 2016 3:11 PM
To: Mochon, Julie
Cc: Gwen Schuit; Joseph Birli
Subject: 6100 Comments

Greetings,

Please see attached for my comments related to the proposed 6100 regulations.

Respectfully,

Norm Ressler
Program Coordinator

Friendship Community
1149 East Oregon Road
Lititz, PA 17543
717.656.2466 ext. 1132
FriendshipCommunity.net
FriendshipArt.net

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Impacting the World with Capabilities

1149 East Oregon Road, Lititz, PA 17543 | 717.656.2466 | 717.656.0459 Fax
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December 20, 2016

Julie Mochon
Human Service Program Specialist Supervisor
Office of Developmental Programs
Room 502, Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120

NOTE: Attachment is duplicate other Friendship Comm. attachments.

Re: Comments on Regulation No. 14 – 540

Dear Ms. Mochon:

Friendship Community wishes to submit the following comments and suggestions to the proposed rulemaking published by the Department of Human Services (“Department”) on November 5, 2016. As a Provider of supports and services for Individuals with intellectual disabilities and/or autism, the regulations are of vital importance as we strive to assist Individuals to achieve meaningful community integration and to achieve greater independence consistent with their person centered support plans. Our comments and suggestions relate to individual regulations and include recommended adoption of text or deletion of text in order to further clarify our comments and suggestions.

In working with Individuals and their families over the past 44 years, it is our desire to provide thoughtful comments and suggestions, guided by the varied experiences throughout our Organization. We wish to advocate for regulations and policies that will best support Individuals, consistent with the principles contained in the “Everyday Lives” Office of Developmental Programs publication. This industry is dependent on a single payer system, therefore, the scope of regulatory oversight of service provision and the formulation of the criteria for continued licensure will have a definite effect on the economic viability of continued service provision. As a Provider of varied services, we request a rate setting process that reflects sustainability and predictability in order to align costs with payments consistent to support each consumer’s mandated support plan.

The Notice of proposed rulemaking published on November 5, 2016 invites public comment and neither imposes nor references any conditions or limitations or restrictions on the format and wording of public comments. We understand that, in proposing and adopting regulations, the Department itself is subject to requirements relating to style, usage and format

(e.g., the use of "shall" as opposed to "will"). But, and as confirmed by the Independent Regulatory Review Commission, those style and format rules applicable to the Department do not constrain the style and format of public comments, which the Department must respond to if submitted within the comment period to the location identified in *The Pennsylvania Bulletin*.

We appreciate the opportunity to make public comments and suggestions regarding this vital change in regulations (which will replace Chapter 51 rulemaking) for Pennsylvania citizens supported by a trained and dedicated workforce that are in dire need of fair and competitive wages and benefits. We believe well written and supportive, general regulations will lead to a sustainable system for these most vulnerable Pennsylvania citizens, well into the future.

Sincerely,



Norman Ressler, Program Coordinator
Friendship Community