

Kroh, Karen # 3160

#14-540-(345)

From: Thaler, Nancy
Sent: Sunday, February 12, 2017 11:48 AM
To: Bob Will; Kroh, Karen
Cc: Cherpes, Gregory
Subject: RE: Medication Administration Section of Regs

Thanks Bob....

NANCY Thaler | Deputy Secretary
PA Department of Human Services | Office of Developmental Programs
625 Forster Street Room 502 | Harrisburg PA 17120
717.787.3700 | Cell:717.649.8499
www.dhs.pa.gov<<http://www.dhs.pa.gov>>

Supporting Pennsylvanians with developmental disabilities and their families to achieve greater independence, choice, and opportunity in their lives.

2017 FEB 14 PM 1:42

RECEIVED
IRRC

From: Bob Will [<mailto:Bobw@barberinstitute.org>]
Sent: Friday, February 10, 2017 2:39 PM
To: Kroh, Karen <c-karkroh@pa.gov>; Thaler, Nancy <nthaler@pa.gov>
Subject: Medication Administration Section of Regs

Good afternoon Nancy and Karen,

I spent a few hours carefully reviewing the language in 6100.461 through 6100.470 against the language in the medication administration course and the public commentary that I am aware of. While there are issues related to redundancy when comparing the regulations to the course, at the stage we are at in the process of ODP finalizing the regulations, those redundancies do NOT warrant a change to the language in the proposed regulations in my opinion.

I would respectfully observe however that the vast majority of the specific process requirements that are put forth in regulations are present in detail within our medication administration program. It seems to me that it would be more effective and efficient for the regulation in this instance to reference the medication administration program for the process detail rather than incorporating that level of detail into the formal rule making itself (Easier to change the course requirements than to change the regulations if we find a better process a few years out).

Thanks for opportunity to further review and comment and for all of the effort and time that the Office has invested.

Hope that you both have a good weekend and can steal a few moments to relax and clear your heads just a bit.

Bob