14-540 (#431)

September 14, 2017

Julie Mochon, Policy Director Office of Developmental Programs, Room 502 Health and Welfare Bldg. 625 Forester Street, Harrisburg, PA 17120

Dear Ms. Mochon:

RECEIVED IRRC

I wish to address the changes made to the 55PA Code Chapter 6100 Regulations.

The fee schedule rates appear to me to be written for individuals in a group home setting where multiple people are housed in a residence. This does not take into consideration an individual being housed in a residence for one person. The expense for this type of program will necessarily be higher. The reason for this type of program is the requirements for the health, safety and welfare of the person is such that available providers are not able to accommodate the quality of care needed. Therefore, appropriate staffing needs to be secured and supervised in such a way that the individual's needs are met. An individual with a dual diagnosis, autistic spectrum disorder, physical limitations, along with health problems and behavioral issues must have staff trained specifically for their needs. To secure and try to maintain a constant staff they have to be compensated for their service according to the challenges they face on a daily basis. This includes wages, benefits and the cost of specialized training they need to meet the requirements of their job. The residence has to have the necessary accommodations to meet the physical limitations and behavioral issues of the individual, as well as office space for the staff. The residence, also, needs to be in a setting that the behaviors of the individual will not disturb neighbors. Transportation requires a special vehicle with accommodations made for safety.

These considerations need to be made on an individual basis and not lumped into a fee schedule rate used for an individual who is sharing a residence and staff in a group home. The costs are higher if providing for one person.

These general comments apply to anyone who would qualify for an individual residential program. An example of the necessity of this type of program is, Gregory Ginoble, (Gregory's Journey). The fact that over a period of several years, this individual support has proven effective for him, is reason enough to continue the funding as it has been. The single residence is made safe for his needs, the staff is trained for him, which has lessened the negative behaviors and has improved the overall welfare of someone who scores a category #7 – 4ng on the SIS.

All of these things have led to a stable and better quality of life that is not, and cannot be provided by other local provider agencies. The fee schedule rates need to be flexible to

adjust for the different needs of the individual involved. For this reason an individual residential program needs to be looked at differently than just using the fee schedule rates.

Thank you for any consideration given to this letter.

Barbaro Fichenland

Sincerely,

Barbara A. Eichenlaub

(Concerned parent of an individual with multiple challenges)