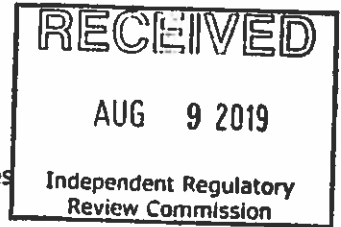


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Cheryl Yohn

From: Gross, Annette <Annette.Gross@wfspa.org>
Sent: Friday, August 9, 2019 1:05 PM
To: IRRC
Cc: Pompa, Kate; Cawoski, Julie
Subject: IBHS regulations Opposition to the inclusion of CRR host Homes



Agency: Wesley Family Services (WFS)
Title: IBHS proposed regulations

Wesley Family Services offers a continuum of behavioral health services. In review of the IBHS proposed regulations the inclusion of CRR (Community Rehabilitative Residential) services is included in the IBHS regulations. WFS is opposed to the inclusion of CRR in the regulations. CRR as considered an extensive MH placement for children with a primary behavioral health diagnosis with significant behavioral symptomology. CRR is provided in either a family setting (Host Home) of group home setting.

A CRR host home setting provides a child with a medical necessity for CRR host home to be cared for a least restrictive placement setting, which is an actual family setting. These families receive thorough pre service training and are developed to allow therapeutic support and staff into their home. The host parents become an important aspect of treatment by documenting behaviors, triggers and motivators that can help spur behavioral changes. The host parents also become informal supports to the child's family of origin. Throughout the course of the year, the host parents need to secure training above and beyond traditional foster families. They are trained in de-escalation, as the children placed in their care present with significant behaviors. They are encouraged and developed to report incidents and work through crises until therapeutic modalities help to reduce and stabilize behaviors.

Recruitment and retention of CRR level host home families is difficult. The families must receive more training that a traditional foster home. The families receive children with significant presenting behaviors. The behaviors and interventions can be stressful on host home family. For those families that complete a placement they area able to share how working effectively as team member benefits the child and family. They can share incidences of growth in their role; gaining a better understanding of symptoms and effective parenting techniques that help support behavioral change.

In review of the IBHS regulations the role of host home parent would need to meet the requirements of the associate level employee. This would put in increase burden on recruitment of host home families; limiting the pool of qualified individuals. The training requirements set forth would place additional stress on the host home parents. They would need to secure the training set forth by the associate level. One would then question if you approved a host parent who had a bachelor or mater degrees would the higher training requirements pertain to them.

CRR host homes under 5130 regulations are to meet the standards set forth by Children Youth and Families foster home regulations. However, it has been the experience of CRR host home providers that the CRR family host homes are subjected to the CRR group home regulations. Given the history of licensing standards, CRR host homes will need to meet the standards of CRR group homes, thus pushing host families into the requirements and expectations set forth for employees. In doing so, an additional barrier to recruitment of CRR host families will incur. IBHS should eliminate CRR host homes from the inclusion of services covered in their regulation. There is already a process established to negotiate with the referring MCO additional supports and interventions needed at the initial treatment team meeting.

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wesley family services

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