

3209

**Kathy Cooper**

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**From:** Cynthia Reddy <cynredss@gmail.com>  
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**To:** IRRC  
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I had one point I wanted to add in addition to my previous statement. The regulations need to address staffing in the context of having RBTs as full time employees and guidelines company need to spell out to cover for illness etc. This is extremely important especially if you are a parent with a child whom requires a one to one. If there is no support person the parent ends up jeopardizing their jobs on too many occasions. There are plenty of stories of parents being fired from jobs, exhausting FMLA not necessarily because there is something wrong with the child but due to poor planning on the companies parts, poor staffing, poor retention etc because typically RBTs are not full time positions with benefits. These gaps in the system lead to parents not being able to work and many times live in forced poverty because of the fractures in the system and all things roll down hill and it falls square into the parents laps. There is nothing in the regulations that address this widespread problem.

