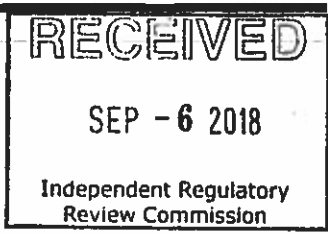


14-546-81 3209

Champa, Heidi

From: Celenza, Erica <ecelenza@pennfoundation.org>
Sent: Tuesday, September 04, 2018 3:03 PM
To: PW, IBHS
Cc: Springer, Debra; Williams, Julie; Stengel, Michelle
Subject: Comment regarding IBHS proposed regulations.



Ms. Pride,

Penn Foundations has concerns with the funding, related primarily to the staffing functions necessary to be compliant with the proposed regulations to IBHS. Requirements with respect to staffing; qualifications, credentials, supervision and training all increase under the proposal. The worksheets provided may work out well on paper however the reality of the provision of IBHS services operationalized is different. Providers have difficulty currently finding, hiring and retaining qualified staff. The training alone would create a financial burden, given high staff turnaround as well as the number of fee for service clinicians. It seems as though the solution lies in increasing the census but that can only be done ethically if there are enough qualified staff to service clients. The conversation is circular but all goes back to the ability to financially support a quality IBHS program. Penn Foundation has a relatively small IBHS program. The proposed rules around staffing requirements would impact us greatly. We recognize and accept there is a need for oversight. However we ask that you review and reconsider the requirements under §5240.11 - §5240.13, §5240.70 - §5240.73, §5240.81 - 5240.83, §5240.93 and §5240.101 - 5240.103, all related to staffing and training.

Thank you for your time and consideration.

Sincerely,

Erica Celenza

Erica Celenza
Compliance Manager
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