



Hello-

Please see the response below to the proposed amendment, 55 Pa.Code Chapter 5230, from St. Luke's Penn Foundation. Thank you for this opportunity to comment.

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Jill Valiant, Manager Wellspring Clubhouse
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5230.21 Content of Individual Record

As 14 is the age of consent for MH treatment in the state of Pennsylvania, we do not support the amendment that parents be allowed to sign consent for psych rehab services for their children. This undermines the relationship between practitioner and adolescent from the start, as psych rehab is a voluntary service.

5230.31 Admission Requirements

We do not support the amendment that the LPHA be required to describe moderate to severe functional impairment; this role should be limited to identification of present functional impairment. Description and assessment of need is done by the program as a part of intake; the LPHA description is unnecessary and often not strengths oriented.

Further, we believe that the potential benefit of the program for his/herself should be identified by the participant.

Finally, we prefer the language "functional assessment" rather than "functional impairment screening," which is neither person-first nor strengths oriented.

5230.4 Psychiatric Rehabilitation process and practices

Wellness as a separate domain should be better defined; a suggestion would be to utilize the 8 Dimensions of Wellness as defined by Peggy Swarbrick and adopted by SAMHSA. It is our belief that the domains that are currently assessed are based on wellness management, that wellness management is the foundation for all the work done and progress made in psych rehab services.

5230.52 General Staffing Requirements

It is not clear whether 25% of current employed staff or staff including vacant positions is required to have their CPRP. As everyone is well aware, staff vacancies are an issue.

5230.54 Group Services

We read this to mean that members cannot congregate in together their own homes to participate in psych rehab activities. We disagree with this, as the ability to be together in their own home environment promotes participation and community.

5230.61 Assessments

We believe that the assessment should be updated only when functioning changes, and that these updates should be done between the individual and psych rehab staff. The inclusion of natural supports in the psych rehab assessment and goal planning process is voluntary at the discretion and preference of the individual being served. It is our preference to not have external supports, such as family and friends, present onsite at our Clubhouse to participate in this update process, as this is potentially disruptive to the environment as well as a potential violation of confidentiality.

5230.62 Individual Rehabilitation Plan

We believe that individuals should be required to document their participation in the process by signing, and staff should document the reason should the individual decline to do so.

5230.63 Daily Entry

It is our belief that individuals should be required to document their program participation by signing the daily record. We believe that requiring signatures promotes active participation in the psych rehab services an individual is receiving, and furthers the perception of the individual as an active participant in their own recovery, rather than a passive recipient of services rendered.