

15-543-1  
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**From:** [Suhring, Scott](#)  
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Please find attached our comment to the proposed Adult Protective Services Regulations.

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Regulation No. 14-543

RE: Clarification regarding the wording of when a mandated reporter is not required to report.

On page 3 of Protective Services for Adults Proposed Regulations document, section under Paperwork Requirements, outlines when a mandatory reporter is not required to report:

*Written reports of alleged abuse, neglect, exploitation or abandonment shall be submitted for every oral report made by facilities designated as mandatory reporters. When a mandatory reporter is not required to report to a Commonwealth licensing or regulating agency, the reporter shall use a two-page mandatory abuse report form. This form is a paperwork requirement, which takes approximately a half-hour or less to complete. The reporter is required to submit the form within 48 hours by e-mail or fax to the agency, and in certain cases, to law enforcement. The 48-hour, written reporting requirement is required by Act 70. This regulation emphasizes that requirement and adds information on what happens to the report after it is received by the agency.*

It is unclear when a mandated reporter is NOT required to report. There is no other reference to this language in the proposed regulations addressing this issue, and is contradictory to the rest of the document that outlines mandated reporter requirements.