



#14-548-31 Received 1/31/2023



Pennsylvania Clubhouse Coalition

To: Department of Human Services
Office of Mental Health and Substance Abuse Services
Commonwealth Tower, 11th Floor
303 Walnut Street, Harrisburg, PA 17101

Dear Director Baker,

I am writing on behalf of the 18 OMHSAS licensed and accredited Clubhouse Model Psychiatric Rehabilitation programs in the state of Pennsylvania to request changes to the 5230 regulations that we believe are necessary and if changed, we believe will result in positive improvements to these vital mental health services. I recognize that the public comment period has closed, however, I respectfully submit this request with hopes that you will take them under consideration. These comments are a result of more than a year of discussion within our statewide coalition and represent the consensus opinion of our constituency which includes the staff, individuals in services (members), and stakeholder agencies that make up Clubhouse programs.

The PA Clubhouse Coalition submits to you a request to make an exception to section 5230.63 for those Clubhouses, who are in good standing with Clubhouse International accreditation, to the Daily Entry requirement under current Psychiatric Rehabilitation standards. It is my understanding that CMS does not require daily entry documentation under their rules for psychiatric rehabilitation. We would request that Pennsylvania's regulations align with the federal guidelines which allow for documentation of services to be completed in a weekly note.

As Clubhouses in Pennsylvania, we already have regulation requirements that are distinct and different from the other models of psychiatric rehabilitation programs (site based or mobile). Clubhouses are required in 5230 to be accredited by Clubhouse International. This accreditation is important to the quality of these programs and we support that requirement. However, meeting these additional requirements sets the Clubhouse model apart from other psychiatric rehabilitation models under the same regulations.

Allowing Clubhouse's to follow the federal guidelines for weekly documentation of services and response to services would provide our programs with opportunities to enhance and improve the services offered. Specifically, the Clubhouse Model ensures that members have quality Supported and Transitional Employment services, which far exceeds the employment support, if any, offered by other psychiatric rehabilitation models. Streamlining our documentation requirements would allow our staff and our programs to dedicate more service time to supporting members who are pursuing employment. We

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also believe having some relief from daily entry notes would support the recruitment, training, and retention of our workforce, which would help to create a more stable and sustainable future for our Clubhouses.

The PCC is prepared to support our Clubhouse programs with transitioning to a weekly format, if that were an option that is provided under the revised regulations. We would collaborate to create a template that all our programs would use and assist with any discussions necessary with MCO's or other organizations that might be impacted by this change. It would be the highest priority to ensure that a weekly note would outline the interventions, response to interventions, and goal-related activities that staff supported through the provision of psychiatric rehabilitation services in Clubhouses.

Thank you for receiving and considering our request. If you need any additional information or clarification on this request. Please do not hesitate to contact me.

Sincerely,

Sarah Hurst, CPRP
President of the Pennsylvania Clubhouse Coalition

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