

Department of Human Services
OMHSAS – BPPPD, Attention: Laurie Madera
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14-548-24

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RE: OMHSAS' proposed Psychiatric Rehabilitation Services (PRS) regulations to amend Chapter 5230 to allow individuals who are 14 years of age or older but under 18 years of age who meet the admission requirements to access PRS. In addition, the proposed regulations amend the diagnoses that allow an individual to access PRS without use of the exception process.

Achieva, one of western Pennsylvania's largest advocacy and provider organizations, supports more than 10,000 children and adults with disabilities and their families throughout western Pennsylvania. Achieva provides early intervention, advocacy, family support, employment, community living supports, in home and community services, special needs trusts and future planning. Achieva is pleased to submit these comments and recommendations.

General Provisions:

1. We support the changes to the Definitions, and we specifically support the use of the Substance Abuse and Mental Health Services Administration's (SAMHSA) definition of "wellness".
2. Under psychiatric rehabilitation process and practices, we support the addition of an individual's home as a location where PRS services can be delivered and as an authorized billing and payment site.

General Requirements:

1. We support the changes and the addition of an individual's home as a location where PRS services can be delivered and as an authorized billing and payment site.

Admission, Continued Stay and Discharge Requirements:

1. We support the changes and the addition of Autism Spectrum Disorder to the list of diagnoses that do not require review through the exception process.

Rights:

1. We support the changes.

Staffing:

1. We support the changes and the addition of an individual's home as a location where PRS services can be delivered and as an authorized billing and payment site.
2. Regarding telehealth, the wishes of the individual receiving services and/or parents or legal guardian, when applicable, should be given priority when determining whether or not to use telehealth.
3. Regarding group services in a private home, that decision should be made by the individuals receiving services and parents/legal guardians when applicable.
4. Confidentiality must always be protected whenever and where ever services are provided.

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