



received: 6/13/2025  
#14-555-31



June 12, 2025

Dear Don and Crystal,

I would like to thank you for hosting the PRTF regulation meeting on 5/21/25, and for your continued work to create regulations that providers are able to effectively implement. Following this meeting, there were three areas in which I wanted to provide additional feedback.

- 1) Regarding 5330.14 Reportable Incidents: based on the conversation had during this meeting, it was presented that the timeline to report all incidents (regardless if they fell under (b) or (c) were moved from 12 to 24 hours. However, that is not what is written in the powerpoint as it only states that this timeline was changed under (c) on page 7, so I would just ask that both sections clearly state that the timeline is 24 hours. We appreciate the additional time given.
- 2) Regarding 5330.51(c) Initial Staff Training: OMHSAS asked providers for feedback to help define what regular and direct contact means. It would be our recommendation/suggestion that this refers to any individual whose job responsibilities include the direct supervision and treatment of an individual while in the program. This requirement would not include those that may come in contact with an individual throughout the day where the supervision and treatment of the individual would be someone else's responsibility at that time (e.g. nurse's who may be in the facility to administer medication pass, culinary staff who are providing food to an individual in the lunch line, etc.).
- 3) Regarding 5330.42(c)(4) Staff Requirements as it pertain to having a MHP on grounds during awake hours: Based on the conversation during the OMHSAS PRTF regulation review meeting, it seems that the spirit of this regulation is to ensure the Mental Health Professionals (MHPs) are connected with the team, know what is occurring with the individuals in care, and have a good understanding of their behaviors within the milieu to guide clinical interventions. During this meeting, it was also acknowledged that PRTFs are each unique in size, specialty, etc., and this is an area where each does something different. If that is true, then our recommendation/suggestion is that each PRTF should be asked to develop their own plan to address this expectation that is approved by OMHSAS in terms of how they ensure the MHPs meet these expectations.

Hoffman Homes feels they already meet these expectations and should not be required to have specific hours/days prescribed for MHPs to be on campus. During regulatory/contract reviews, there have not been any concerns that our MHPs are not well-informed of what is occurring with the individuals we serve. Below are a list of ways that we feel we meet this requirement currently; without being prescribed days/times of work:





- MHP's offices are in the residence, which offers immediate access to the team. They are in regular contact with the direct care staff and the supervisor of the facility.
- Hours vary to include going into the evenings and even sometimes weekends to accommodate families for family sessions.
- MHPs are often working the floor alongside the direct care staff to provide additional support. They also help with transports that may be needed. This includes working additional hours outside of regular business hours.
- Daily contact with direct care staff and supervisors regarding the youth, their clinical presentation, and behaviors.
- Training each month during facility meetings to educate staff on clinical presentations of youth.
- Monthly team meetings for entire team and shift buildings each month for shifts.
- MHPs receive daily reports at the end of each day from the staff.
- MHPs check emails in evenings and on weekends so they are aware of what is occurring within the milieu with their youth.
- MHPs are notified of any major incidents with youth when they are not on campus (requiring 1:1, having to be sent to the hospital, etc.).
- MHPs are informed of any/all self-harm statements, behavior incidents, etc. beyond restraints (which they are also notified of).
- MHPs do daily check-ins with youth outside of therapy sessions, as appropriate.
- MHPs will often join youth in mealtime and other activities throughout the day.
- MHPs are required to do daily check ins for those on 1:1 (7 days a week).

We appreciate you taking the time to review this additional information.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Van der Groef".

Rebecca Van der Groef, LSW  
CEO  
Hoffman Homes, Inc.

