The MH/MR Coalition remains committed to effectively using all available resources to improve the quality of services and supports for individuals with mental retardation and individuals with mental illness. The Coalition believes that the best way to ensure quality community services and supports is to ensure a stable, well-trained workforce.

This Working Together Campaign Update contains a copy of the letter sent from the MH/MR Coalition to the Secretary of Public Welfare, Feather Houstoun regarding the proposed consolidation of Adult and Adolescent Part-Day (AAPD) regulations. These draft "cross-system" AAPD Regulations were originally presented in 2001 and were tabled after considerable negative comments were received from stakeholders, including the MH/MR Coalition and its member associations.

Although the MH/MR Coalition supports the original intent of cross-system licensure of similar facilities – resulting in less onerous regulatory and licensing procedures and more effective use of existing funds for services - the draft proposed AAPD regulations do not accomplish that end. The implementation of these regulations not only would add significant new costs but are also not in line with the values that support quality services and supports for people with mental retardation or people with mental illness.

The MH/MR Coalition remains hopeful that the new administration will consider the extensive comments received by the disability community, providers of services and supports and counties and determine that the AAPD consolidated regulations are inappropriate.

A copy of the MH/MR Coalition letter to Secretary Houstoun and the Department of Public Welfare (DPW) begins on page 2 of this Update. For copies of previous letters regarding the proposed AAPD regulations, you are welcome to contact any of the Coalition associations listed below.
December 4, 2002

Feather O. Houstoun, Secretary  
Pennsylvania Department of Public Welfare  
P.O. Box 2675  
Harrisburg, Pennsylvania 17105-2675

Dear Secretary Houstoun:

This letter questions the purpose of a meeting that DPW has scheduled for December 9th for stakeholders to discuss the draft Adult and Adolescent Part Day regulations. The redraft of the regulations shows little evidence that the questions we raised and the meaningful input we provided during the last stakeholders meetings have been considered.

The thoughtful considerations and recommendations of all of the statewide mental health and mental retardation associations, the county MH/MR administrators association and statewide advocacy associations have been ignored.

In letters dated April 13, 2001 and June 18, 2001, the MH/MR Coalition respectfully requested that the Department of Public Welfare stop the current Adult Residential and Adult and Adolescent Part Day regulations consolidation process. We provided numerous comments and recommendations that we firmly believe should be considered in any redrafting of the regulations.

In addition to the letters from the MH/MR Coalition, each MH/MR Coalition member association separately provided extensive feedback. The meeting on December 9th would simply be a restatement of everything that we already gave to the Office of Licensing and Regulatory Management before in our previous comments.

The implementation of these regulations not only would add significant new costs but are also not in line with the values that support quality services and supports for people with mental retardation or people with mental illness. Our comments remain essentially the same and we emphatically repeat our request that the Department stop development of these draft regulations until the issues we raised are addressed satisfactorily.

Sincerely,
The MH/MR Coalition includes all of the major associations that represent mental health and/or mental retardation provider agencies and counties in Pennsylvania: Mental Health Association in PA (717.236.8110), MH/MR Program Administrators of PA (717.232.7554), PA Association of Rehabilitation Facilities (717.657.7608), PA Association of Resources for People with Mental Retardation (717.236.2374), PA Community Providers Association (717.657.7078), The Arc-PA (717.234.2621), and United Cerebral Palsy of PA (717.761.6129). For additional information, contact any of the organizations listed.
Robert Derr, Policy Specialist
Office of Mental Retardation, DPW

Dave Kerr, Director
Governor’s Policy Office

Robert A. Bittenbender, Secretary
Office of the Budget

John R. McGinley, Chairman
Independent Regulatory Review Commission

The Honorable George Kenney, Jr., Majority Chairperson
House Health and Human Services Committee

The Honorable Frank Oliver, Minority Chairperson
House Health and Human Services Committee

The Honorable Harold Mowery, Jr., Chairperson
Senate Public Health and Welfare Committee

The Honorable Vincent J. Hughes, Minority Chairperson
Senate Public Health and Welfare Committee

Karen Snider, Co-Chair of the DPW Transition Team