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Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101
irrc@irrc.state.pa.us

Re: Rulemaking # 14-548: Psychiatric Rehabilitation Services IRRC #3347

August 16, 2024

Dear Commissioners,

This letter is to provide comment on the final form amendments to 55 PA. Code Chapter 5230- Psychiatric Rehabilitation Services.

Pennsylvania Clubhouse Coalition (PCC) is composed of the 18 licensed psychiatric rehabilitation programs utilizing the Clubhouse Model. This opinion is representative of the constituents in PA Clubhouse programs and to provide final comment on the proposed PRS regulations. The PCC is overwhelmingly supportive of the proposed regulations, but would like to provide comment regarding expansion of services to those under the age of 18.

Section 5230.21: Minor Consent

The PCC supports minors 14 and up in having access to PRS services, however, it is imperative that their ability to consent or decline enrollment and participation in PRS is protected, consistent with the voluntary nature of PRS and PA Act 65.

An essential part of the Clubhouse International accreditation standards is that membership is voluntary and “there are no agreements, contracts, schedules, or rules intended to enforce participation of members”. Allowing parents or guardians of individuals under the age of 18 to consent for services on behalf of the individual, would put at risk the accreditation of Clubhouse programs.

Enrollment without participants consent would be in conflict with the practice principles of Certified Psychiatric Rehabilitation Practitioners. The Psychiatric Rehabilitation Association states in Principle 7: “Psychiatric rehabilitation practices promote self-determination and empowerment. All individuals have the right to make their own decisions, including decisions about the types of services and support they receive.” This needs to apply to all individuals in services, regardless of age. It is our association's belief that coerced or mandated participation in PRS does not benefit the individual and may cause a disruption in the services for those who are attending voluntarily.

The PCC appreciates the opportunity to provide comments and supports the IRRC's implementation of the proposed PRS regulation changes.

Sincerely,

Sarah Hurst, CPRP
President of the Pennsylvania Clubhouse Coalition

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