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To Whom It May Concern:

The following comments were omitted from my comments submitted on October 5, 2018 and are hereby submitted as a supplement to those original comments.

“I am submitting the following comments as a member of the public and the parent of an adult with developmental disabilities. In submitting these comments, it is important to note that the Department is to be commended in the open shareholder process used to develop the proposed regulations. It is a refreshing reflection of recent efforts by the Department to attempt to reach out to the community it serves.” Add: It is important to note that while the shareholder process is admirable, the segment of the affected population which actually participated was very small. As such, improvements need to be made in reaching out to the affected population

Specific Comments:

A. 221-RICR-10-00-1

ADD:

3. Article 1.20.1.C includes the term “mentally retarded” in the text. Given the efforts of society to remove this term from use, the presence in the regulation is disconcerting

B. 221-RICR-10-05-1

ADD:

6. The supporting documents discuss “certification standards” in detail. Understood that they stand apart from the regulation. Why are they not discussed at all.? CLARIFIED: to read “Why are they not discussed at all in the body of the proposed regulation.”
7. Definitions § 1.46 through § 1.50 and § 1.76 and § 1.105 of the existing regulations were deleted. The supporting documentation for the proposed regulation states : “was deleted as no

- longer referenced in the regulations and was included under the Supported Employment Services definition.” There does not seem to be an Supported Employment Services definition in the proposed regulation.
8. Definition § 1.73 “Personal Care Attendant” definition deleted. Supporting documentation for the proposed regulation states “Term is sufficiently clarified in definition of “Behavior Supports.” “There is no definition in the proposed regulation for Behavior Supports.
 9. Definition § 1.83 “Residential Support Services” deleted from definitions. The supporting documentation for the proposed regulation states “as the term is no longer referenced in regulations. Term is defined in the Licensing Regulations.” The term could not be found in the proposed Licensing Regulation.
 10. There are a significant number of other instances where in the supporting documentation that items were indicated to have been moved to **221-RICR-10-00-1** and the items could not be found in that regulation. These should be corrected.

Thank you for consideration of the comments provided.

Respectfully submitted,

signed electronically

Howard I. Cohen