

#6LIC NMH

Newport Mental Health

Comments on 212- RICR-10-00-1

Regulations should be broad, over-arching guidelines for the provision of services. As currently written, the regulations are too prescriptive. The regulations in this section apply regulations for Developmental Disability service organizations to Behavioral Health Organizations. Regulations in this subchapter need to be specific to the organizations to which they apply.

1.13 E

The regulation that an Organization shall be prepared for periodic full quality program reviews need to be clarified. What would these reviews include and how often would they take place? When would an organization be notified before a review?

1.20.2

Newport Mental Health has an internal risk management program, and the Internal Investigation Protocol is designed for DDOs.

1.20.3 B

The training requirements are too prescriptive, including the requirement for annual training. Training is done according to best practices, and should not be mandated.

1.21 E

The requirement to annually review the status of employee criminal background is again too prescriptive.

1.25.2

Individual Summary Information should be clarified to apply to community residence clients only. Also, the details required are too great, especially with the availability of this information in the EHR at all sites.

1.25.5 Item I 2 c

Fire Drills in non-residential programs should only record the number of staff on the premises, not the name of each staff member.

1.26 Item G 5 e

Individuals have reasonable access to food based on dietary needs.

1.26 Item G 5 f

Individuals may have visitors of the choosing at any time that does not conflict with their person centered care plan.