

**In The Matter Of:**  
*Public Hearing on Rules and Regulations*

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*Rules & Regulations For the Licensing of Organizations & Facilities*  
*September 18, 2018*

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## STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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IN RE: \*

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RULES AND REGULATIONS FOR \* (212-RICR-10-00-1)  
THE LICENSING OF \*  
ORGANIZATIONS AND FACILITIES \*  
LICENSED BY THE DEPARTMENT \*  
OF BEHAVIORAL HEALTHCARE, \*  
DEVELOPMENTAL DISABILITIES \*  
AND HOSPITALS \*

\*\*\*\*\*

DATE: September 18, 2018

TIME: 1:00 P.M.

PLACE: Pastore Complex  
Arnold Conference Center  
111 Howard Avenue  
Cranston, Rhode Island 02920

## APPEARANCES:

FOR THE DEPARTMENT OF BEHAVIORAL HEALTHCARE,  
DEVELOPMENTAL DISABILITIES & HOSPITALS:

BY: Kevin Savage, Associate Director of  
Behavioral Healthcare, Developmental  
Disabilities & Hospitals

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## E-X-H-I-B-I-T-S

EXHIBIT NO.	DESCRIPTION	PAGE
Exhibit 1	Public Notice of Proposed Rulemaking (2 pgs).....	3
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Exhibit 5	Letter from Gail Theriault dated September 18, 2018 (3 pgs).....	3
Exhibit 6	212-RICR-10-00-01 Licensing and General Administration (2 pgs)	3

1 (HEARING COMMENCED AT 1:02 P.M.)

2 EXHIBITS 1-6 MARKED FOR I.D.

3 MR. SAVAGE: Okay. We'll get started.

4 Welcome. We're here today regarding a public  
5 hearing concerning the proposed regulations,  
6 "Rules and Regulations For the Licensing of  
7 Organizations and Facilities Licensed By the  
8 Department of Behavioral Healthcare, Developmental  
9 Disabilities and Hospitals (212-RICR-10-00-1)."

10 This hearing is being conducted under the  
11 provisions of the Administrative Procedures Act,  
12 Rhode Island General Laws, Section 42-35-3. Today  
13 is Tuesday, September 18, 2018.

14 My name is Kevin Savage, and I will be the  
15 Department Official for today's proceeding.  
16 Before we start, and so as not to interrupt the  
17 proceedings, I would like to ask those of you with  
18 cell phones to turn them off at this time.

19 The purpose of the hearing today is to  
20 afford interested parties an opportunity to  
21 comment on the proposed regulations. This hearing  
22 is intended for your participation only, and is  
23 not intended as a means of providing a forum for  
24 discussing, debating, arguing, or otherwise having  
25 any dialogue on the record with members of the

1 Department of Behavioral Healthcare, Developmental  
2 Disabilities and Hospitals.

3 If you would like to speak, the procedure  
4 we will use is as follows:

5 Register outside of the room.

6 Speakers will be taken in order of  
7 registration.

8 Five minutes will be allowed for your  
9 presentation, unless the lack of speakers allows  
10 for additional time.

11 When you are called:

12 Come to the podium in the front of the  
13 room:

14 Identify yourself by name and affiliation,  
15 if any.

16 Make your presentation.

17 If you have a written copy of your  
18 statement, we would appreciate having that for the  
19 record.

20 After the time has elapsed for submission  
21 of written commentary, the Department has four  
22 options under state law:

23 The first option is to file "as is" with  
24 the Secretary of State.

25 The second option is to file with minor

1 changes.

2 The third option is to make major changes  
3 in what you see before you today which would  
4 necessitate a new public hearing.

5 The fourth option is to not file, in which  
6 case, the current regulations would remain in  
7 effect.

8 Unless otherwise specified by law or  
9 regulation, if filed, the regulations become  
10 effective 20 days after filing and have the force  
11 of law.

12 Are there any questions on how the public  
13 hearing will be conducted today? At this time,  
14 for the record, we have a presentation of  
15 exhibits:

16 The first, Notice of Proposed Rulemaking  
17 dated, September 6, 2018.

18 Second, copies of e-mails sent to "BHDDH  
19 Public Notice of Proposed Rulemaking" list on  
20 September 7th, 2018 noticing the 30-day public  
21 comment process.

22 Third, a copy of the existing regulations,  
23 "Rules And Regulations For Licensing Procedure and  
24 Process for Facilities and Programs Licensed by  
25 the Department of Behavioral Healthcare,

1     Developmental Disabilities and Hospitals.

2             And, fourth, a copy of the proposed rules  
3     entitled, "Rules and Regulations for the Licensing  
4     of Organizations of Facilities Licensed By the  
5     Department of Behavioral Healthcare, Development  
6     Disabilities and Hospitals dated June 2018."

7             At this time, I would like to call the  
8     first speaker. That's Owen Heleen. Do you want  
9     to come to the podium?

10            MR. HELLEN: Thank you. Thank you, Mr.  
11     Savage. I'm Owen Heleen, vice president for  
12     Strategy at the Providence Center. We'd like to  
13     thank the Department for the opportunity to offer  
14     these comments on the proposed regulations. We'll  
15     also be submitting a fuller set of written  
16     comments by the October 6th deadline. If you  
17     could tell me after my comments where I should  
18     e-mail a copy of these comments, I will be happy  
19     to do that tonight.

20            We have several concerns about these  
21     regulations. The first concerns an omission or  
22     typographical error in the proposed regulation.  
23     In Section 1.17.1.A.4, a phrase seems to be  
24     missing in the fourth line. It now reads: "At a  
25     minimum, one board member shall be an individual"

1 and it leaves off. So there just seems to be a  
2 missing line in the proposed reg. Otherwise, we  
3 appreciate the effort to promote inclusion and  
4 representation of the community served, and the  
5 efforts of the Department to ensure that  
6 documentation of compliance with this regulation  
7 remains non-public.

8 We have other substantive concerns about  
9 Section 1.21, Personnel, and 1.21.A.1.C. We  
10 believe the Department should clarify that this  
11 regulation is meant to apply to individuals who  
12 are consultants or contractors and not to  
13 corporations or entities contracted to provide  
14 services for consulting.

15 Our more significant concerns are about  
16 the procedures and list of disqualifying offenses  
17 outlined in Section 1.21b. We believe that  
18 elements of this proposed regulation run counter  
19 to the state's effort to promote the employment of  
20 individuals and recovery from substance use  
21 disorders. These regulations stipulate that an  
22 applicant against whom disqualifying information  
23 has been found may request that a copy of their  
24 criminal background check be sent to the employer  
25 in cases in which potentially disqualifying



1 information has been reported. This element of  
2 the proposed regulation puts the onus for  
3 compliance on the candidate.

4 The Providence Center has had extensive  
5 experience in employing staff in recovery who have  
6 potentially disqualifying criminal records. In  
7 our organization we've established a process in  
8 which the executive committee of our board of  
9 trustees review such cases. This process relies  
10 on the partnership between the applicant and our  
11 organization, and ensures proper view of  
12 potentially disqualifying information.

13 We ask all applicants to ask that a copy  
14 of the criminal record report be sent to the  
15 organization as a matter of course, putting the  
16 onus on the applicant to ask the state police or  
17 the local police department to forward a copy of  
18 their criminal background check may reinforce the  
19 stigma associated with substance use disorder and  
20 unnecessarily delay the review of the employment  
21 of people in recovery. So those are our comments.  
22 I appreciate your time and the Department's  
23 efforts. Thanks so much.

24 MR. SAVAGE: Next. Donna Martin?

25 MS. MARTIN: Good afternoon. My name is

1 Donna Martin. I'm the Director for Community  
2 Provider Network of Rhode Island. I'm here on  
3 behalf of my members in support of the proposed  
4 Licensing and General Administration, Chapter 10  
5 of Title 212.

6 I have several specific comments to offer  
7 and then a general closing statement. My first  
8 specific comment is relative to the section on  
9 Definitions #37: "Non-congregate residential  
10 support services." In this definition there is a  
11 reference to "Core" residential services. We  
12 believe this was mistakenly carried over from the  
13 previous regulations as there is no longer a  
14 working definition or service category of "Core"  
15 residential services, and we ask that all  
16 references to "core" services be stricken.

17 Definition #52: "Staff." It is our  
18 opinion that the reference to interns and  
19 particularly to volunteers be removed from this  
20 definition as volunteers are clearly not staff, as  
21 they are not employed by the organization. We ask  
22 that intern and volunteer reference be stricken  
23 from this definition.

24 Section 1.20.1, "Duty to Report." Item C  
25 references "patients." We take exception to the

1 identification of people served in our sector as  
2 "patients" and being "mentally retarded," and ask  
3 that that reference be corrected. Additionally,  
4 in the same section there is a reference to  
5 protocol for reports involving Eleanor Slater  
6 Hospital. It appears that this may have been  
7 mistakenly referenced in the BHO and DDO  
8 regulations.

9 Item #4, Section 1.20.1, "Duty to Report."  
10 Item E references the requirement to make a  
11 telephone report to the Office of QA. Current  
12 practice requires that reports be made online via  
13 the Department reporting platform. We ask if this  
14 is an error, or if the policy is changing.

15 Item #5, Item 1.21, "Personnel."  
16 Subsection A.1.b - references the requirement to  
17 conduct BCI and NCIC background checks. As  
18 discussed, this is a costly, unfunded mandate, and  
19 we urge the state to enact a policy that aligns  
20 with state statute ensuring that the state pays  
21 for or reimburses DDOs and BHO providers for this  
22 cost.

23 Number 6, Item 1.21, "Personal."  
24 Subsection E.4. This item is unclear and suggests  
25 that the requirement to update background checks

1 occur on an annual basis. We ask for  
2 clarification in this.

3 Number #7, Item 1.25.5, "Fire Safety and  
4 Fire Drill Requirements." Section D, this item  
5 specifically states the requirement of four hours  
6 of training per staff per year on fire safety.  
7 This requirement is excessive and reduces the  
8 available training time of other equally important  
9 issues. We ask that this be adjusted to suggest  
10 that all staff receive annual fire safety  
11 training.

12 That is the end of my specific comments.  
13 In conclusion, we'd just like to add -- we'd just  
14 like to commend the Department, the Division of  
15 DD, and specifically the Office of Facilities and  
16 Program Standards and Licensure for their fidelity  
17 to an open stakeholder engagement process as these  
18 regulations were reviewed and updated.

19 The members of CPNRI who were engaged in  
20 this process greatly appreciate the opportunity  
21 for sincere input and dialogue as we've worked  
22 toward creating a body of regulation that reflects  
23 contemporary best practice and while setting the  
24 guide rails for person-centered practices and  
25 agency operations. Thank you.

1 MR. SAVAGE: The next person is Mary Beth  
2 Cournoyer.

3 MS. COURNOYER: My name is Mary Beth  
4 Cournoyer. I'm a parent, so I went through this,  
5 and in the area of "Governance" in 1.17.1A, the  
6 third line item in the subcommittee, we had  
7 decided that the language would be that the Board  
8 of Directors shall have fiduciary and operational  
9 oversight. In our new version it just says, "The  
10 board shall have appropriate organization  
11 oversight." I thought it was a bit vague. I kind  
12 of like how we had crafted it in the subcommittee.

13 In 1.17.1A the fourth item, we had decided  
14 we would say, "At least 25 percent of the board  
15 shall be participants and/or family members of  
16 participants." In the new version we've written,  
17 "At least 25 percent of the board shall be persons  
18 who reflect the population served by the  
19 organization and/or family members of the  
20 individuals."

21 I actually had to read that a few times to  
22 figure out who reflects the population. I just  
23 thought it was a bit unclear, so I thought, you  
24 know, keep it simple. Just revert back to kind of  
25 what we had decided in the subcommittee. Then I

1 thought there should be a #13, so I added, "The  
2 leadership of a DDO shall communicate through  
3 training the DDO's mission, vision, values and  
4 plan to all staff of the DDO and participants.

5 Again, not in the new version, but was in  
6 the old version, and I found that meaningful and  
7 useful.

8 In the section of "Organizational Ethics."  
9 In subcommittee, we had discussed personnel files.  
10 So that's the #10 item in 1.17.1 C. So the 10th  
11 item referred to personnel files, and we were  
12 going to add "or appropriate record."

13 In Section 1.18 A, that was as close as I  
14 could find to quality assurance. In the old regs  
15 we had about three pages worth of really bulleted  
16 very clear items regarding quality assurance. In  
17 the new version, we really have two snippets  
18 regarding quality assurance. I think there should  
19 be a whole descriptive section regarding quality  
20 assurance and improvement program.

21 I know that in the old version, Sections  
22 8, 9 and 10, you know, it had language regarding  
23 that it should have program and documentation  
24 requirement section that identifies all records,  
25 entries and documentation required by these

1 regulations shall be:

2 a. Prepared at the time, or immediately  
3 following, the event recorded.

4 b. Accurate and contain no willful  
5 falsifications.

6 c. Legible, dated, and signed by the  
7 person making the entry, and;

8 d. Maintain for no less than seven years  
9 in accordance with the BHDDH Retention Plan.

10 Then it also had a review process section  
11 that stated clearly, "The Department, at it's  
12 discretion, may conduct a full quality review and  
13 monitoring review of any DDO at any time." As you  
14 may recall, we had a healthy conversation about  
15 that, but given that it was written in the  
16 statutes -- again, I think that when we write  
17 things for the DD version of it, you want it  
18 understood by the most amount of people, and so to  
19 just put a small thing, we've taken the DD  
20 section, referred people to this larger section,  
21 now we're asking them again to go to a third  
22 section. I think that's a bit much. So, in this  
23 section, I think it made more sense to add a  
24 robust quality assurance improvement plan section  
25 as was followed in the old regs.

1           The same follows with "Individual and  
2 Participants Rights." When you get to 1.26 G, it  
3 says: "Written statement of 'Rights of  
4 Individual's" names numerous Rhode Island General  
5 Laws that are specifically listed. So, if you go  
6 to the old regs, page 46 to 52 lists almost  
7 verbatim to the statutes, but, again, how many  
8 times are we going to send people -- so I think  
9 participant's rights -- if I'm a person and wanted  
10 to know my rights, I don't want to have to go to  
11 three places. If I went to the DD regs, I would  
12 anticipate to find participant regs. Now I've  
13 gone to this section, and, again, there's just so  
14 much more to it.

15           I really think that ought to be spelled  
16 out. I think that when you reduce that one small  
17 section to three lines, I think by adding it and  
18 making it more robust, I think it will indicate  
19 specific portions of the rights covered. I think  
20 it provides one collective place for easy access,  
21 and I think it will allow for easy understanding  
22 for all populations. So, I would like to see that  
23 brought back in, and not again yet a reference to  
24 general law.

25           I want to thank you for allowing me to



1 participate in the subcommittees. You've treated  
2 all of us fairly. You were able to keep us on  
3 task and move us forward. I felt that it was very  
4 productive, and I was grateful to be a part of the  
5 process. So, thank you to you and to all the  
6 people invested in doing this for us.

7 MR. SAVAGE: There are no other speakers  
8 on my list. Is there anybody else who wishes to  
9 participate right now?

10 (NO RESPONSE)

11 MR. SAVAGE: Kerry sent me a text that  
12 there was a backup on 37. I just wanted to be  
13 sure everybody had an opportunity to speak who  
14 wanted to. So, last call, any other speakers?

15 (NO RESPONSE)

16 MR. SAVAGE: Okay. The submission of any  
17 written commentary on the proposed regulations  
18 will be accepted until the close of business on  
19 Saturday, October 6th, 2018, and to avoid any  
20 confusion, we'll accept submissions until midnight  
21 on October 6th, 2018.

22 Thank you for your attendance at this  
23 hearing. It is now closed.

24 (HEARING CONCLUDED AT 1:20 P.M.)

25

## C-E-R-T-I-F-I-C-A-T-I-O-N

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PROVIDENCE, SC.

I, SALLY BRASSARD, do hereby certify that  
the foregoing is a true, accurate, and complete  
transcript of my notes taken at the above-entitled  
proceeding.

IN WITNESS WHEREOF, I have hereunto set my  
hand this 28th day of September, 2018.

*Sally Brassard*  
*Notary Public*



---

SALLY BRASSARD, CSR/RPR  
NOTARY PUBLIC  
MY COMMISSION EXPIRES: 1/16/21

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