



California Association of Psychiatric Technicians

October 24, 2013

Eric Gleber
Assistant Director, Legislation & Regulation
Department of Developmental Services
1600 9th Street, Room 322, MS 3-10
Sacramento, CA 95814

By email:

Re: CAPT Testimony in response to Proposed Regulations relating to ***Title 17, Department of Developmental Services, Licensed Residential Facilities – Secured Perimeters.***

Dear Mr. Gelber,

The California Association of Psychiatric Technicians (CAPT) is both the professional organization for all 13,000 California Psychiatric Technicians and the elected union representative for state-employed Psychiatric Technicians and related professionals. We are writing to express our concerns with the inadequate and potentially dangerous minimum levels of training required of level of care staff employed in these delayed egress homes.

Delayed egress homes will be housing individuals with incredibly challenging behaviors, lack of danger awareness, aggression issues and other challenges for which staff need to be properly trained. The proposed regulation for these delayed egress homes requires a minimum of 16 hours of training for direct care staff, and this appears to only apply when staff are being left alone with clients.

At the very least, the regulations must require that secured residences, designed to serve this challenging population, have as 24/7 staff licensed psychiatric technicians, along with supporting staff specializing in behavioral management to reduce what is the likely option of restraining medication as well as injuries to other residents and staff.

The state, by comparison, when serving individuals with behavioral challenges in federally regulated Developmental Centers, utilizes licensed Psychiatric Technicians. Psych Techs are state-licensed, -trained and -regulated professionals who receive at a minimum 1,530 hours of clinical and classroom training. Their licensing and certification are subject to two-year renewals and ongoing continuing education, regulation and training, including unique-in-the-nation training on nursing, mental illnesses and developmental disabilities. Developmental Centers also have on staff psychologists, social workers, nutritionists, registered nurses, pharmacists, therapists and other professionals trained to assist these Californians.

While we believe that there should be appropriate and personalized options available for people with challenging behaviors, it is important not to curtail the types and quality of services they need and deserve. The proposed regulations for these new delayed egress homes short-changes Californians with developmental disabilities by requiring less than adequate training requirements on staff. While the provider always has the option of requiring more of its staff, all too often we have seen providers only operate at the bare minimums in order maintain profit margins. By not requiring more training

requirements for the direct level of care staff, the proposed regulations are setting these facilities and their residents up for failure.

Our members are uniquely trained, licensed and regulated to empower and assist the Californians they serve. Their goal is to ensure that all individuals reside and thrive in the best possible situations to suit their personal needs, choices and wishes. However, this organization cannot sit quietly by and allow regulations be passed that do not provide the best possible care for the individuals California Psychiatric Technicians are formally pledged to serve.

Respectfully,

A handwritten signature in black ink, appearing to read 'Coby Pizzotti', with a large, stylized flourish at the end.

Coby Pizzotti

Consultant

California Association of Psychiatric Technicians