

Submitter :

Date: 10/03/2007

Organization :

Category : Other Health Care Provider

Issue Areas/Comments

GENERAL

GENERAL

See attachment

#269

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DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE AND MEDICAID SERVICES
OFFICE OF STRATEGIC OPERATIONS & REGULATORY AFFAIRS

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Please direct your questions or comments to 1 800 743-3951..

Submitter : Mr. simcha feuerman
Organization : Ohel Childrens Home and Family Services
Category : Health Care Professional or Association

Date: 10/03/2007

Issue Areas/Comments

Background

Background
440.130(d)(1)(i)

Collections of Information Requirements

Collections of Information Requirements

The final rule should clarify the requirements of an acceptable individualized recovery goal.

The proposed regulations do not include the criteria for a Medicaid reimbursable individualized recovery goal

GENERAL

GENERAL

Some additional comments:

Regarding 440.130(d)(1)(vii) Definition of medical services

The final rule should include diagnosis as a covered rehabilitation service. Diagnosis is important in determining the nature of the client's need and what treatment should be provided.

Provisions of the Proposed Rule

Provisions of the Proposed Rule

440.130(d)(1)(vi) Definition of Restorative Services

The final rule should clarify the meaning of restorative services. We know that in practice, helping individuals recover from mental illness is not easily defined in terms of strict medical terms such as cure or improvement. Our goal is to improve function, and increase social and vocational integration, but certain individuals move at a slow rate. Still for others, keeping out of the hospital is a major accomplishment.

Submitter : Ms. Robin Ide
Organization : Ms. Robin Ide
Category : Other Health Care Professional

Date: 10/03/2007

Issue Areas/Comments

Background

Background

The plan to limit or discontinue funding for wraparound care for children with autism spectrum disorder.

GENERAL

GENERAL

I am not prepared to have our government legislate that families with a member on the autism spectrum will have to give up on any hope of progress, improvement, and a productive life for their child. The services that this legislation proposes to limit or discontinue are the best chance that many of these children, and, by extension, their families, have of positive change. When you have seen a child who is unable to even make eye contact, who is unable to speak or communicate in any way, who has repetitive behaviors that are beyond their control, and that child becomes able to relate to a parent, to behave in more socially acceptable ways that make it possible for them to have a friend, or to at least function in a class of other individuals with concerns, you come to believe in these services. All but the most financially well-off families will just have to accept that their child will never be any better, will never learn, will never have hope for the quality of life that we all want for our children. Please consider that thousands of children will become a "lost generation" if these services are discontinued, and please ensure that they will continue to have hope for a better life.

Submitter : Mrs. susan greene
Organization : AIM Center, Inc.
Category : Other Health Care Professional

Date: 10/03/2007

Issue Areas/Comments

Background

Background

CMS-2261-P - Rehabilitation Services: State Plan Option
concerning the elimination of social education as part of rehabilitation.

GENERAL

GENERAL

I am very concerned to hear that Medicaid would no longer fund Rehabilitive services for the person with sever and persistent mental illness. One the major disabling factors they have to deal with is the loss or lack of social skills. To disallow the training of social skills for these persons would prevent them from living in our communities. They need the type of social support and education that is offererd at day programs and club house models as much as they need their medication. It would do no good to reduce psychotic symptoms with medications and then do nothing to provide oppportunity for growth and development. I have served in day programing with the mentally ill for over 15 years and have seen the value of this type of rehabilitation. I hope you will seriously reconsider the section of this bill.

Submitter : Mr. Paul Curry
Organization : Sunshine Clubhouse
Category : Social Worker

Date: 10/03/2007

Issue Areas/Comments

GENERAL

GENERAL

October 3, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 21244-8018

To whom It May Concern:

In response to the recent request for comments on the Proposed New CMS Rules on Medicaid Rehabilitation Services I am submitting the following opinion.

I am writing to state my concerns about rule changes published on August 13, 2007, that I believe will have a possible negative effect for people throughout the United States who have mental illness.

I have been a social worker for over 25 years and have been involved in providing services to the mentally ill most of those years. I am currently the director of the Sunshine Clubhouse that is certified by the International Center for Clubhouse Development (ICCD). I am concerned that the proposed rule changes will adversely affect the lives of many of the people I know here in the Clubhouse. We support recovery from mental illness and the Medicaid changes of returning people to their previous levels of functioning will eliminate many necessary psychosocial rehabilitation services among them Clubhouses.

In my years of service to people with mental illness, I believe that the Clubhouse Model of psychosocial rehabilitation truly has helped people recover from the effects of mental illness. I witness people returning to the world of work, education, friendships and independence. It would be tragic not to have Clubhouses funded appropriately by Medicaid. On behalf of my friends in the Sunshine Clubhouse and Clubhouses throughout the United States, I ask that rules be made that continue to help people recover their lives. Not including Clubhouses in the rules would be an unconscionable mistake.

Sincerely,

Paul Curry
57194 Clona Court
South Bend, Indiana

Submitter : Mr. Shaun Schermerhorn
Organization : Breakthrough of Sedgwick County
Category : Social Worker

Date: 10/03/2007

Issue Areas/Comments

GENERAL

GENERAL

In Response to the proposed rule changes to Medicaid Rehabilitation Services option. It is my contention that the proposed changes will put even further restraints on agencies to offer sufficient services to persons with a mental illness. The proposed changes, I feel, will lead to further spending on the "back end", and in the long run end up costing the state more resources.

Submitter : Jennifer DeFeo

Date: 10/03/2007

Organization : Jennifer DeFeo

Category : Other Health Care Provider

Issue Areas/Comments

GENERAL

GENERAL

See Attachment

DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE AND MEDICAID SERVICES
OFFICE OF STRATEGIC OPERATIONS & REGULATORY AFFAIRS

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Please direct your questions or comments to 1 800 743-3951..

Submitter : Mr. Luis Kranz
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

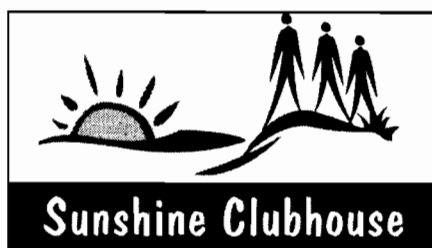
Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-2261-P-277-Attach-1.DOC



October 3, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

To Whom It May Concern:

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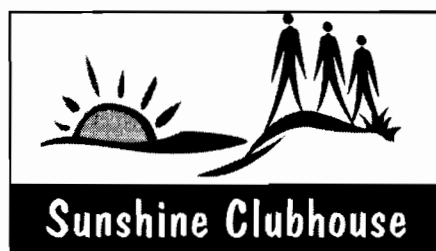
The recent changes in practice by CMS and the associated proposed rule changes published on August 13, 2007 are having a dramatically negative effect at the local level in many states and threaten to do the same throughout the country. The effect of the rule changes may be well intentioned but in practice they will create a situation where medically necessary services and supports will be eliminated for some of this country's most vulnerable citizens – those with severe and persistent mental illness.

Although these rule changes may be appropriate for people with physical rehabilitative needs, according to a recent NAMI publication, 73% of people receiving Medicaid rehabilitative services, have mental health care needs. People with long term mental illness have a very distinct set of long term needs, for a wide array of supporters; these are quite different from the needs of others requiring rehabilitative services, and must be funded differently. The dramatic shift of mental health funding to Medicaid has diminished the flexibility for states to provide the needed community services to people with mental illness.

Some of the proposed rule changes simply reduce this population's access to needed services – without any back up plan to fund services or programs. Many of these services have been working effectively with CMS approved Medicaid funding for more than ten years. However, with the recent changes in CMS practice, they now find that they are no longer able to provide the crucial support network that people with serious mental illness so desperately need. The net result is that numbers of people with persistent mental illness are being deprived of a chance to build a meaningful future for them. To create, or suddenly start enforcing, bureaucratic clinical and administrative processes without additional or alternative funding from states is the equivalent of a substantial cut in services for people who already have more than their fair share of burdens. A reduction or elimination of services puts individuals with severe and persistent mental illness at risk of unnecessary institutionalization in our hospitals or even worse in our prison system.

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617

Phone: (574) 283-2325 Fax: (574) 283-2029



Our example of the inappropriateness of these changes in funding programs for people with mental illness is the emphasis on returning a person to “previous levels of functioning.” Because recovery from mental illness is often a long-term process, this definition will likely reduce or eliminate many necessary psychosocial rehabilitation type services and supports.

Although I wholeheartedly support the idea of “person centered” services and rehabilitation plans, it would be ineffective and eventually very expensive to have this kind of plan without a consistent funding stream for the other necessary recovery focused services such as education, employment, housing and pre-vocational services. Clubhouses affiliated with the International Center for Clubhouse Development (ICCD) have a long and rich history of providing a cost effective array of services such as these in a community based environment, ICCD Clubhouse more than other programs have strong partnerships with the local business, educational institutions and other social service providers.

Therefore it is my opinion that none of the proposed rule changes should be implemented until each state (or the federal government) has a plan in place to provide the necessary recovery focused services that would be “covered” by Medicaid. The plan must not exclude people with mental illness from psychosocial services needed to maintain their recovery progress, such as ICCD Certified Clubhouse.

It is a mistake to re-organize funding for long approved services in an effort to reduce short term spending. A poorly developed strategy will result in unnecessary – and more costly emergency spending and over-reliance on emergency services.

Most importantly, these changes will have a tragic impact on the lives and futures of millions of people struggling to recover from the long-term effects of serious mental illness. In the interest of short term spending cuts, these changes will quickly erode the essential support networks that allowed Americans with serious mental illness to begin the long and difficult process of rebuilding their lives. In my opinion, that would be an unconscionable mistake.

Sincerely,

Luis Kranz
1908 N. Merrifield Ave.
Mishawaka, IN 46545
Phone: 574-217-7431

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Dr. David Shern
Organization : Mental Health America
Category : Consumer Group

Date: 10/03/2007

Issue Areas/Comments

Background

Background
see attachment

Collections of Information Requirements

Collections of Information Requirements
see attachment

GENERAL

GENERAL
see attachment

Provisions of the Proposed Rule

Provisions of the Proposed Rule
see attachment

#278

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DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE AND MEDICAID SERVICES
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Please direct your questions or comments to 1 800 743-3951..

Submitter : Ms. Beverly Millsaps
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

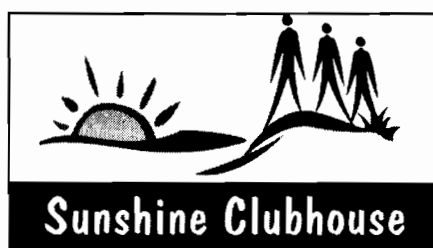
Issue Areas/Comments

GENERAL

GENERAL

See Attachment

CMS-2261-P-279-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

To Whom It May Concern:

In response to the recent request for comments on the Proposed New CMS Rules on Medicaid Rehabilitation Services I am submitting the following opinion.

The recent changes in practice by CMS and the associated proposed rule changes published on August 13, 2007 are having a dramatically negative effect at the local level in many states and threaten to do the same throughout the country. The effect of the rule changes may be well intentioned but in practice they will create a situation where medically necessary services and supports will be eliminated for some of this country's most vulnerable citizens – those with severe and persistent mental illness.

Although these rule changes may be appropriate for people with physical rehabilitative needs, according to a recent NAMI publication, 73% of people receiving Medicaid rehabilitative services, have mental health care needs. People with long term mental illness have a very distinct set of long term needs, for a wide array of supporters; these are quite different from the needs of others requiring rehabilitative services, and must be funded differently. The dramatic shift of mental health funding to Medicaid has diminished the flexibility for states to provide the needed community services to people with mental illness.

Some of the proposed rule changes simply reduce this population's access to needed services – without any back up plan to fund services or programs. Many of these services have been working effectively with CMS approved Medicaid funding for more than ten years. However, with the recent changes in CMS practice, they now find that they are no longer able to provide the crucial support network that people with serious mental illness so desperately need. The net result is that numbers of people with persistent mental illness are being deprived of a chance to build a meaningful future for them.

To create, or suddenly start enforcing, bureaucratic clinical and administrative processes without additional or alternative funding from states is the equivalent of a substantial cut in services for people who already have more than their fair share of burdens. A reduction or elimination of services puts individuals with severe and persistent mental illness at risk of unnecessary institutionalization in our hospitals or even worse in our prison system.

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617

Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com



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Although I wholeheartedly support the idea of “person centered” services and rehabilitation plans, it would be ineffective and eventually very expensive to have this kind of plan without a consistent funding stream for the other necessary recovery focused services such as education, employment, housing and pre-vocational services. Clubhouses affiliated with the International Center for Clubhouse Development (ICCD) have a long and rich history of providing a cost effective array of services such as these in a community based environment, ICCD Clubhouse more than other programs have strong partnerships with the local business, educational institutions and other social service providers.

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It is a mistake to re-organize funding for long approved services in an effort to reduce short term spending. A poorly developed strategy will result in unnecessary – and more costly emergency spending and over-reliance on emergency services.

Most importantly, these changes will have a tragic impact on the lives and futures of millions of people struggling to recover from the long-term effects of serious mental illness. In the interest of short term spending cuts, these changes will quickly erode the essential support networks that allowed Americans with serious mental illness to begin the long and difficult process of rebuilding their lives. In my opinion, that would be an unconscionable mistake.

Sincerely,

Beverly Millsaps
2526 Bow Court
South Bend, Indiana 46628
574-855-2504

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Ms. Claudia Patterson

Date: 10/03/2007

Organization : Sunshine Clubhouse

Category : Individual

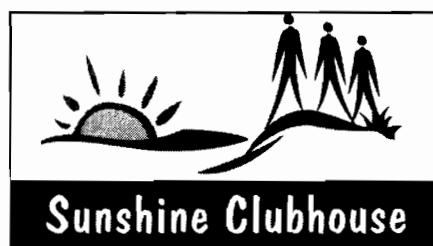
Issue Areas/Comments

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"See Attachment"

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October 10, 2007

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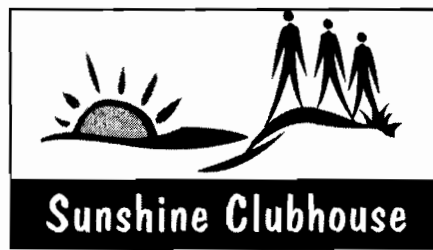
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sunshineclubhouse@sunshineclubhouse.com



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Sincerely,

Claudia Patterson
411 South 26th Street
South Bend, Indiana 46615

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Dr. Robert Smith
Organization : Southwestern Virginia Training Center
Category : Other Health Care Professional

Date: 10/03/2007

Issue Areas/Comments

GENERAL

GENERAL

Regarding Docket: CMS-2261-P - Rehabilitation Services: State Plan Option. This package is likely to result in shifting financial burdens upon the states, and it will result in a reduction in services provided to those most in need of services.

Submitter : Mr. Gary Smith
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

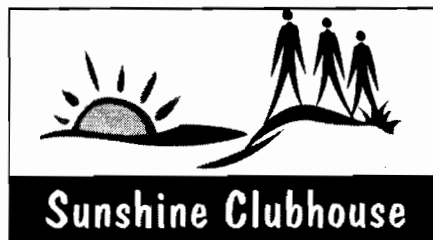
Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

CMS-2261-P-282-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

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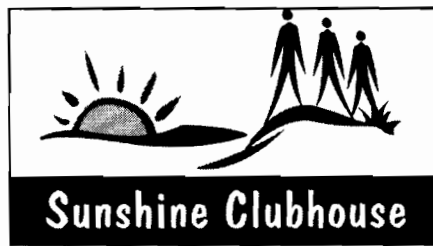
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sunshineclubhouse@sunshineclubhouse.com



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Sincerely,

Gary Smith
808 S. 26th Street
South Bend, Indiana 46614

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Miss. Barbara Jones

Date: 10/03/2007

Organization : Sunshine Clubhouse

Category : Individual

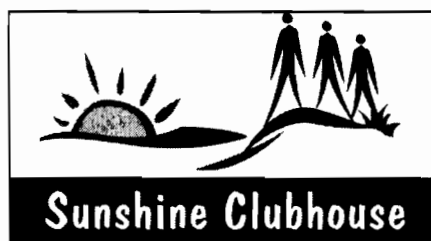
Issue Areas/Comments

GENERAL

GENERAL

"Sec Attachment"

CMS-2261-P-283-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

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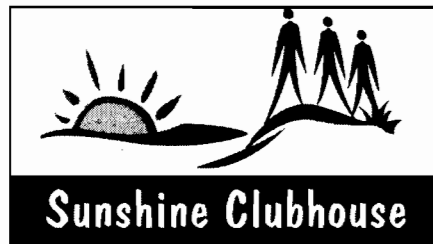
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Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617

Phone: (574) 283-2325 Fax: (574) 283-2029



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Most importantly, these changes will have a tragic impact on the lives and futures of millions of people struggling to recover from the long-term effects of serious mental illness. In the interest of short term spending cuts, these changes will quickly erode the essential support networks that allowed Americans with serious mental illness to begin the long and difficult process of rebuilding their lives. In my opinion, that would be an unconscionable mistake.

Sincerely,

Barbara Jones
211 South Michigan
South Bend, Indiana 46601

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Miss. Anna Hardin
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

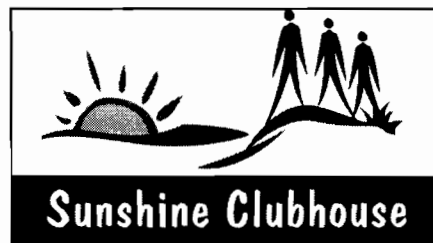
Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

CMS-2261-P-284-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

To Whom It May Concern:

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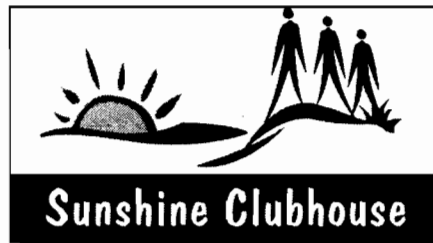
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Some of the proposed rule changes simply reduce this population's access to needed services – without any back up plan to fund services or programs. Many of these services have been working effectively with CMS approved Medicaid funding for more than ten years. However, with the recent changes in CMS practice, they now find that they are no longer able to provide the crucial support network that people with serious mental illness so desperately need. The net result is that numbers of people with persistent mental illness are being deprived of a chance to build a meaningful future for them. To create, or suddenly start enforcing, bureaucratic clinical and administrative processes without additional or alternative funding from states is the equivalent of a substantial cut in services for people who already have more than their fair share of burdens. A reduction or elimination of services puts individuals with severe and persistent mental illness at risk of unnecessary institutionalization in our hospitals or even worse in our prison system.

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617

Phone: (574) 283-2325 Fax: (574) 283-2029



Our example of the inappropriateness of these changes in funding programs for people with mental illness is the emphasis on returning a person to “previous levels of functioning.” Because recovery from mental illness is often a long- term process, this definition will likely reduce or eliminate many necessary psychosocial rehabilitation type services and supports.

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Sincerely,

Anna Hardin
711 Turnock
South Bend, Indiana 46617

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Miss. Rebecca Hupp

Date: 10/03/2007

Organization : Sunshine Clubhouse

Category : Individual

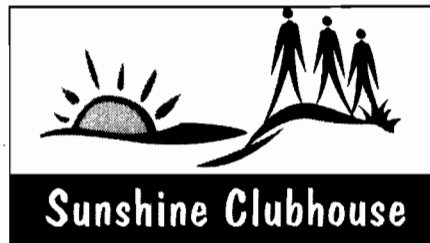
Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

CMS-2261-P-285-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 21244-8018

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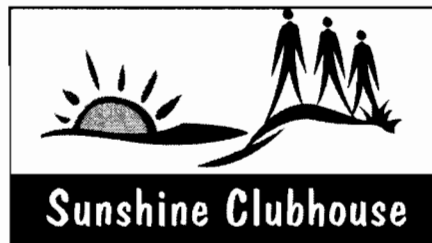
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Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617

Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com



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Sincerely,

Rebecca Hupp
1001 West Jefferson
South Bend, Indiana 46545

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Mr. Edward Love
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

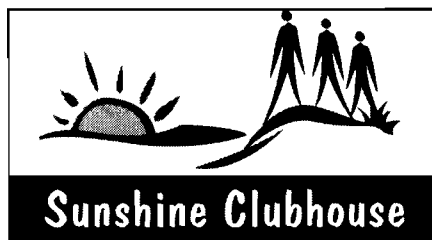
Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

CMS-2261-P-286-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

To Whom It May Concern:

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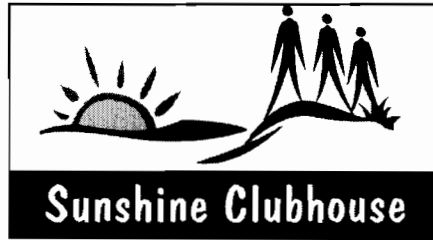
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Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617

Phone: (574) 283-2325 Fax: (574) 283-2029



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Sincerely,

Edward Love
1518 Lincoln Way West
South Bend, Indiana 46618

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Mr. Warren Wong
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

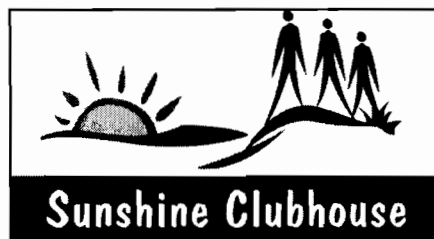
Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

CMS-2261-P-287-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

To Whom It May Concern:

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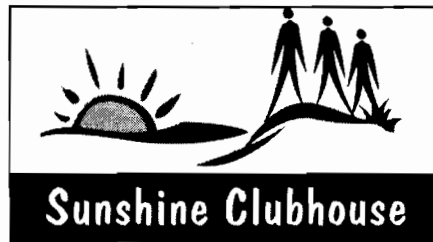
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Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617

Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com



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Sincerely,

Warren Wong
Portage Manor
3016 Portage Avenue
South Bend, Indiana 46628

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Ms. Jayne Kovatch
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

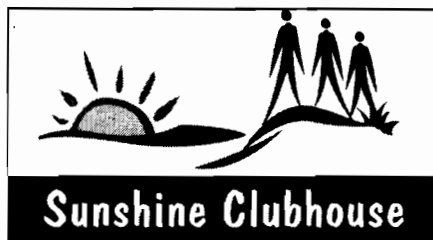
Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

CMS-2261-P-288-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

To Whom It May Concern:

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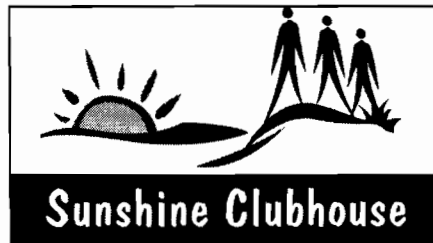
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Phone: (574) 283-2325 Fax: (574) 283-2029



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Sincerely,

Jayne Kovatch
1120 Lincoln Way East
South Bend, Indiana 46601

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Miss. Debra Waumans

Date: 10/03/2007

Organization : Sunshine Clubhouse

Category : Individual

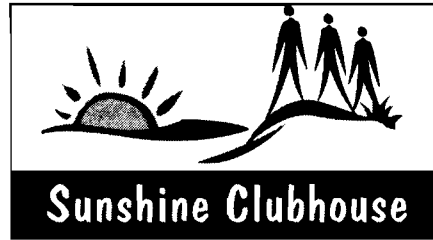
Issue Areas/Comments

GENERAL

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"See Attachment"

CMS-2261-P-289-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

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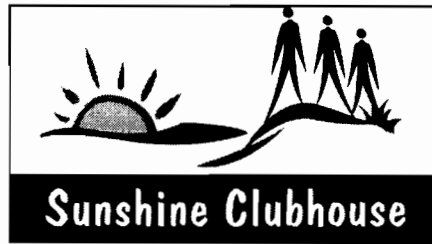
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Sincerely,

Debra Waumans
146 Manor Drive
Mishawaka, Indiana 46544

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Miss. Kathleen Sweeney

Date: 10/03/2007

Organization : Sunshine Clubhouse

Category : Individual

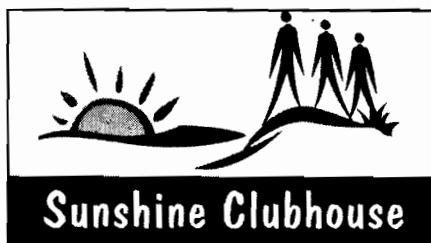
Issue Areas/Comments

GENERAL

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"See Attachment"

CMS-2261-P-290-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
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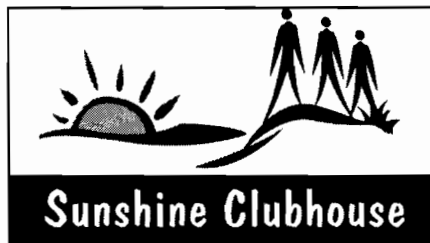
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Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617

Phone: (574) 283-2325 Fax: (574) 283-2029



Our example of the inappropriateness of these changes in funding programs for people with mental illness is the emphasis on returning a person to “previous levels of functioning.” Because recovery from mental illness is often a long-term process, this definition will likely reduce or eliminate many necessary psychosocial rehabilitation type services and supports.

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Sincerely,

Kathleen Sweeney
3415 E. Jefferson Square
South Bend, Indiana 46615

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Miss. Jamie Burleson

Date: 10/03/2007

Organization : Sunshine Clubhouse

Category : Individual

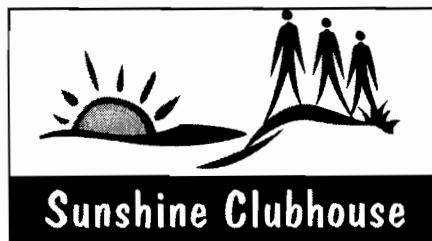
Issue Areas/Comments

GENERAL

GENERAL

"See Attachment"

CMS-2261-P-291-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

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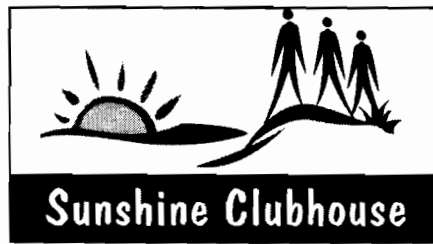
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Sincerely,

Jamie Burleson
2925 E. Hastings
South Bend, Indiana 46615

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Miss. Frances Postlewaite

Date: 10/03/2007

Organization : Sunshine Clubhouse

Category : Individual

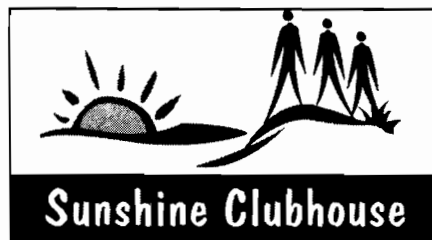
Issue Areas/Comments

GENERAL

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"See Attachment"

CMS-2261-P-292-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

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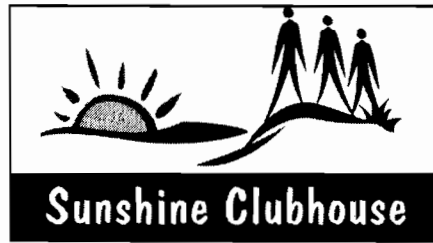
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Sincerely,

Frances Postlewaite
218 S. Falcon
South Bend, Indiana 46619

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Miss. Davena Miller
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

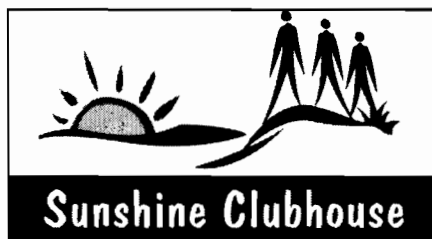
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GENERAL

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"See Attachment"

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October 10, 2007

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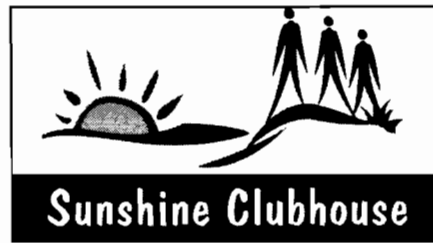
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Sincerely,

Davena Miller
328 Runaway Bay Apartments
Mishawaka, Indiana 46545

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Mr. Eric Finnstrom

Date: 10/03/2007

Organization : Sunshine Clubhouse

Category : Individual

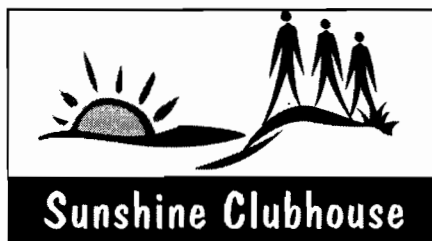
Issue Areas/Comments

GENERAL

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"See Attachment"

CMS-2261-P-294-Attach-1.DOC



October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 212440-8018

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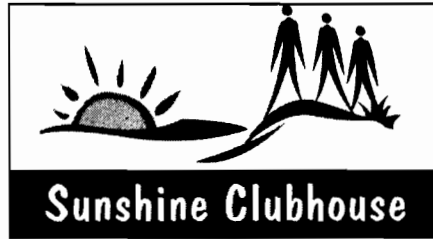
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Sincerely,

Eric Finnstrom
5024 Western Ave.
South Bend, Indiana 46619

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Mr. Douglas Majors
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

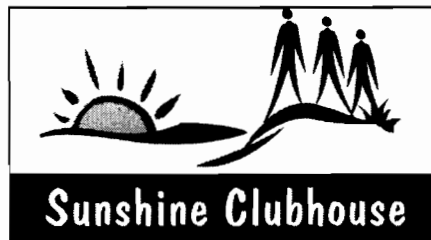
Issue Areas/Comments

GENERAL

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October 10, 2007

Centers for Medicaid & Medicare Services
Department of Health and Human Services
Attn: CMS-2261-P
P.O. Box 8018
Baltimore, MD. 21244-8018

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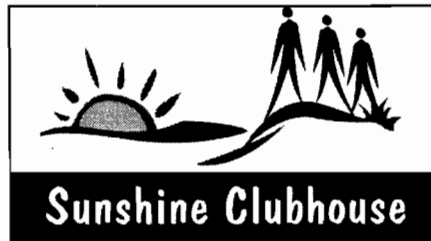
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Douglas Majors
218 Maplewood Ave.
Mishawaka, Indiana 46544

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com

Submitter : Mrs. Jacqelin Tunai
Organization : Sunshine Clubhouse
Category : Individual

Date: 10/03/2007

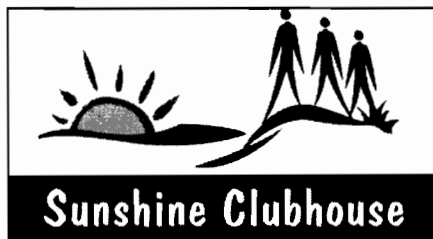
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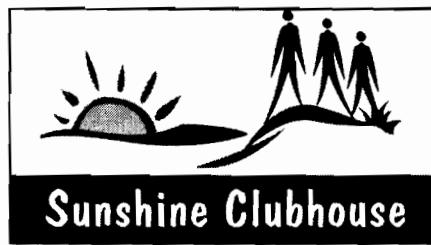
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Our example of the inappropriateness of these changes in funding programs for people with mental illness is the emphasis on returning a person to “previous levels of functioning.” Because recovery from mental illness is often a long- term process, this definition will likely reduce or eliminate many necessary psychosocial rehabilitation type services an supports.

Although I wholeheartedly support the idea of “person centered” services and rehabilitation plans, it would be ineffective will and eventually very expensive to have this kind of plan without a consistent funding stream for the other necessary recovery focused services such a education, employment, housing and pre-vocational services. Clubhouses affiliated with the International Center for Clubhouse Development (ICCD) have a long and rich history of providing a cost effective array of services such as these in a community based environment, ICCD Clubhouse more than other program have strong partnerships with the local business, educational institutions and other social service providers.

Therefore it is my opinion that none of the proposed rule changes should be implemented until each state (or the federal governmental) has a plan in place to provide the necessary recovery focused services that would be “covered” by Medicaid. The plan must not exclude people with mental illness from psychosocial services needed to maintain their recovery progress, such as ICCD Certified Clubhouse.

It is a mistake to re-organize funding for long approved services in an effort to reduce short term spending. A poorly developed strategy will result in unnecessary – and more costly emergency spending and over-reliance on emergency services.

Most importantly, these changes will have a tragic impact on the lives and futures of millions of people struggling to recover from the long - term effects of serious mental illness. In the interest of short term spending cuts, these changes will quickly erode the essential support networks that allowed Americans with serious mental illness to begin the long and difficult process of rebuilding their lives. In my opinion, that would be an unconscionable mistake.

Sincerely,

Jacqelin Tunai
3314 West Ford St.
South Bend, Indiana 46619

Sunshine Clubhouse - 520 Crescent Avenue - South Bend Indiana 46617
Phone: (574) 283-2325 Fax: (574) 283-2029

sunshineclubhouse@sunshineclubhouse.com