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August 25, 2022

Amy Whiting, Staff Counsel  
California Department of Developmental Services  
1215 O Street  
Sacramento, CA 95814

**RE: Community Crisis Homes and Enhanced Behavioral Support Homes - Proposed Regulations (17 CCR sections 59000, 59001, 59002, 59006, 59007, 59008, 59009, 59010, 59011, 59012, 59022, 59050, 59051, 59052, 59054, 59055, 59056, 59057, 59058, 59059, 59060, 59061, 59062, 59063, 59064, 59065, 59066, 59067, 59068, 59069, 59070, 59071 and 59072)**

Dear Ms. Whiting:

California's regional centers are a network of 21 community-based non-profits, represented by the Association of Regional Center Agencies (ARCA). The regional centers coordinate services for, and advocate on behalf of, nearly 400,000 Californians with developmental disabilities.

ARCA appreciates DDS's efforts to address some of the issues previously raised by ARCA and welcomes the opportunity to comment on the amended regulations proposed by the Department of Developmental Services (DDS) related to Community Crisis Homes (CCCH) and Enhanced Behavioral Supports Homes.

ARCA acknowledges the work of DDS in developing comprehensive regulations that align with the Welfare and Institutions Code sections 4684.80 - 4684.86 and 4698 - 4698.1 and promote placement into the least restrictive settings.

With regards to the proposed regulations for Children's Community Crisis Homes (CCCH) and Enhanced Behavioral Supports Homes (EBSH), ARCA recommends the following:

**Section 59058: Continuing Education**

The proposed language would require Enhanced Behavioral Support Homes to provide five (5) hours of competency-based continuing education in the areas of person-centered practices, positive behavioral support, trauma-informed care, and cultural competency. This adds five (5) hours of training, requiring direct care staff to complete a minimum of 25 hours of continuing education on an annual basis.

ARCA supports increasing continuing education from 20 to 25 to enhance the services that are provided to consumers however, these changes will require an investment of time and money. Service providers should not be expected to absorb the additional financial burden of compensating staff for non-direct service time this change would necessitate.

ARCA recommends the Department provide regional centers with a methodology to offset the increased financial burden this change would have on service providers.

**59059.5. Transition/Discharge from the Enhanced Behavioral Supports Home.**

The proposed language specifies when a transition plan must be developed for consumers residing in an Enhanced Behavioral Supports Home and that transition plans must be reviewed monthly by the Individual Behavior Supports Team.

To support the transition process and improve the quality of transition efforts, ARCA recommends that Service Code 889 and Form DS6028, which help establish a rate for transition support for Community Crisis Homes (CCH), be expanded to include Enhanced Behavioral Support Homes (EBSH). As is the case with Community Crisis Homes, ARCA recommends this rate only be used to fund additional services and supports for the consumer during times of transition into or out of the EBSH, and that the funding is used for staff training, cross-training, or needs specifically related to the consumer's transition.

ARCA appreciates the opportunity to provide comments to strengthen the delivery of services for those with intensive behavioral support needs. If you have any questions regarding our position, please do not hesitate to contact Darline Dupree in our office at [ddupree@arcanet.org](mailto:ddupree@arcanet.org) or (916) 446-7961.

Sincerely,  
/s/  
Amy Westling  
Executive Director