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Rulemaking (Web Link)**Custom Value:** empty**IP Address:** 67.131.20.93**Response Started:** Monday, March 18, 2013 2:20:38 PM**Response Modified:** Monday, March 18, 2013 2:25:55 PM

1. If you have any comments or concerns about the rulemaking process or general comments about the rules, please provide your comments or concerns below:

Az statutes guide the delivery of DUI and DV services. Independent providers in our county do not provide these type of services because they are booked with insurance panels clients. On the other hand, even if they venture into providing these type of services, they are not fully aware of the requirements and AZ statutes that guide the delivery of service and without proper training they could be easily swayed to just psych ed and not the second part of the requirements (treatment). I'm not sure of what the scope of a BBHE audit will entail, but this will not cover what OBHL audits look for when doing audits. I can foresee many problems across the state, but most specifically in our county.

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1. After reviewing the revised draft of the DUI Services rules, please provide any comments or concerns you may have on the substance of the rules:

By allowing treatment to be completed in a minimum of 3 months, it opens up many concerns. Soon treatment will be offered 2x a week vs 1x by those providers who are only interested in obtaining clients/revenue vs providing best services. It allows for the assignment of as few as 12 sessions. By watering down nationwide proven best practices this revision takes away from the primary concern of DV tx which is victim safety first and foremost, then accountability for the perp. Effective DV tx is a process that takes time. Standardization based on best practices is necessary to provide real victim safety.

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Respondent Type: Normal Response**Collector:** Web Link (Web Link)**Custom Value:** *empty***IP Address:** 206 169 202 209**Response Started:** Tuesday, January 22, 2013 2:11:49 PM**Response Modified:** Tuesday, January 22, 2013 2:31:13 PM**1. After reviewing the revised draft of the DUI Services rules, please provide any comments or concerns you may have on the substance of the rules:**

I am very concerned that adult supportive homes may no longer permit the assistance of foster parents in distributing medications to the residents of the supportive homes. Intermountain has provided adult therapeutic foster home options for SMI adults for more than 15 years. Many of the individuals that we have served in therapeutic foster homes have thrived as a result of the intensive individualized attention that they have received in these settings. Without assistance in taking their medications many of these individuals would have to be placed in Level II group homes at a much higher cost of care. Very few of the many residents that we have served in therapeutic foster care were capable of self-administering their medications. Therefore, I fear that unless adult supportive homes can continue with the option of assistance with medication management most of the residents residing in therapeutic foster homes currently supervised by Intermountain would lose their placement and have to be placed in Level II group homes.