

Pennsylvania Association of Resources  
for Autism and Intellectual Disabilities

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June 19, 2008

Mr. Kevin Casey, Deputy Secretary  
Office of Developmental Programs  
Department of Public Welfare  
P.O. Box 2675  
Harrisburg, PA 17105-2675

Via email: [ra-ODPComment@state.pa.us](mailto:ra-ODPComment@state.pa.us)

**Re: Comments by the Pennsylvania Association of Resources for Autism and Intellectual Disabilities (PAR) on the Draft Bulletin *Clarification of Payment Source for Representative Payee Function***

Dear Deputy Casey,

Thank you for the opportunity to provide comments and make recommendations on the above referenced bulletin.

As you know, the Pennsylvania Association of Resources for Autism and Intellectual Disabilities (PAR) is a statewide association whose members provide the full range of supports and services to more than 45,000 individuals with intellectual disabilities including 8,000 people living with autism in over 5,600 locations.

The draft bulletin is not clear enough with regard to providers of residential community MR services and the representative payee function. While providers of community residential services may act as representative payees and often take on that role, they are not required to be the representative payee. The draft bulletin could be read to mean that providers of residential services are required to take on this role to the exclusivity of others, when in fact, many family members, guardians, other individuals and other organizations act as representative payees.

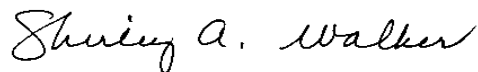
**Recommendation: To avoid misinterpretation of the draft bulletin, PAR recommends adding the following statement to the Background Section:**

**“A residential provider may be appointed to be the representative payee for an individual receiving its services, although family members, guardians, or others may and in many cases do, serve in that role as well. The policy described below applies only to those circumstances where a residential provider is serving as the representative payee.”**

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Thank you for considering our comments and recommendation.

Sincerely,



Shirley A. Walker  
President and CEO