

Blackburn, Thomas

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From: IRRC [IRRC@IRRC.STATE.PA.US]
Sent: Tuesday, February 23, 2010 1:17 PM
To: Blackburn, Thomas; McKeever, Joyce
Cc: Hoffman, Stephen F.; Schalles, Scott R.
Subject: FW: Comments on Act 62 regulations

2010 MAR -8 AM 9:43

INDEPENDENT REGULATORY
REVIEW COMMISSION**Comment received from IRRC**

From: Schalles, Scott R.
Sent: Tuesday, February 23, 2010 11:46 AM
To: Gelnett, Wanda B.
Cc: Hoffman, Stephen F.
Subject: FW: Comments on Act 62 regulations

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From: scavett@verizon.net [mailto:scavett@verizon.net]
Sent: Tuesday, February 23, 2010 11:41 AM
To: st-medicine@state.pa.us; scavett@verizon.net
Cc: Schalles, Scott R.
Subject: Comments on Act 62 regulations

Please add these comments to the official public comments regarding the Act 62 regulations. I would appreciate an email back to confirm these comments have been added. Thank you.

From my experience many providers in the autism/ABA field do not deal with private insurance companies and have no experience with regulations. This includes my provider who has over 15 years of quality experience with thousands of kids. My provider has solely been focused on treating kids not dealing with private insurance companies and government agencies.

Here is the bottom line. I want to make sure the regulations are not so onerous that it limits the amount of people even further than was set out in the law to become behavioral specialists.

The purpose of the law was to expand treatment, not limit it.

If someone fills these basic requirements as set out by the law they should be able to be a behavioral specialist:

Licensing requirements for Behavior Specialists are outlined in Act 62:

- Has received a master's or higher degree from a board-approved accredited college or university in a related field of study;
- Has completed relevant educational and training programs, including but not limited to professional ethics, autism specific trainings, assessments training, crisis intervention, and family collaboration;
- Has at least one year of experience involving functional behavior assessments;
- And has completed at least 1000 hours in direct clinical experience with individuals with behavior challenges or at least 1000 hours experience in a related field with individuals

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with autism spectrum disorders.

I am concerned that any additional requirements such as filing fees, yearly renewals ect... will discourage quality providers from applying for the behavioral specialist designation. These providers are going to get paid since there is a huge demand for their services anyway. The only people who will be hurt by qualified private providers not applying for the behavioral specialist designation are the parents of autistic children.

I have one more comment relating to this. In the last bullet point it mentions that 1,000 hours of experience are needed. How will this 1,000 hours be confirmed? Again, please make this as easy as possible. I believe that a self confirmation of hours worked instead of additional paperwork that a provider might have to get from a person they worked under many years ago is very much preferred.

Thank you for listening.

-Scott