

3209

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Kathy Cooper

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Independent Regulatory
Review Commission

From: Walter Sigut <tugis3@atlanticbb.net>
To: Scott Schalles
Cc: Michelle Elliott
Subject: Final Regulation # 14-546 (IRRC) #3209 Intensive Behavioral Health Services

Scott and Michelle,

I have read the proposal and it is putting such demands on Providers and staff that I am not sure it can be attained.

Example: Previously a Master's level psychologist could provide BSC services.

The state made new requirements that the psychologist or social worker, etc.,

had to have a license to provide services. Since the change we are unable to find Lic. BSC's

to meet the needs of clients. Now, this new regulation is going to have real consequences for clients and providers.

Example: A script or comprehensive initial evaluation can be done by PCP's, Nurses,

Licensed Psychologists, Pediatricians, etc. Other than Licensed Psychologists these other

Professionals have no understanding of what a comprehensive evaluation is and have little

If any level of expertise in dealing with clients who are

Autistic. Also, how would a

Professional, other than a Licensed Psychologist, know how to do the initial evaluation

nor would they have the necessary time to complete an initial evaluation. **I would**

venture to say if you did a survey of these professionals you might not find one

who would want to do initial evaluations. The group other than Licensed

Psychologists would be the only professionals who know how to write reports, make

clinical decisions, and provide a comprehensive evaluation. This other group of

professionals have private practices based on their training and speciality, not writing

comprehensive evaluations out of their realm of their expertise.

Also, Community Care and VBH have set money amounts for evaluations.

Example: CCBH pays between \$300 and \$400 dollars per evaluation. Will that rate

be altered (lowered).

Example: Community Care Behavioral Health pays \$68 dollars per hour for

BSC and Mobile Therapists. \$37 dollars an hour for TSS's. Will that rate stay the same or be lowered.

If rates for services are lowered under the Intensive Behavioral Health Services

Initiative how does a Provider tell staff they will be getting a reduction in pay. Staff will

quit and seek other opportunities. Thus, we will not be able to serve the needs of

the population that Providers now serve.

I hope this message can be shared by all decision makers.

**Respectfully submitted,
Walter J. Sigut, Licensed Psychologist.**