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Malecki, Courtney

From: Gerald Everette <gerald.e@btigroup.info>
Sent: Tuesday, July 16, 2019 9:02 AM
To: Malecki, Courtney
Subject: [External] IBHS Regulations Questions



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Hello Ms. Malecki,

I was reviewing the proposed IBHS regulations that were sent out in the past few weeks and I have some questions about them. I do not know who else to email, so if you are the wrong person I certainly apologize, but would appreciate help in directing me to the correct location.

I am the Clinical Director for a local ABA agency. We currently do not accept MA, but have been considering enrolling with MA, but before we do that we have some questions about IBHS specifically.

- 1.) What would be the most efficient, time wise, for enrolling with MA ... should we enroll with MA now, become a BHRS provider, and then roll into IBHS or would it be more efficient to get an MA number and wait to do anything else until IBHS goes live?
- 2.) Will IBHS allow for the provision of ABA services at an outpatient clinic if the outpatient clinic is NOT a partial hospitalization program? I know that this might be up to the individual MCO, but I'm wondering more broadly with the regs. I see mention of clinics, but I'm not sure how it's classified.
- 3.) Page 20, section (a) ... the original regs had language that made it sound like any agency providing ABA must be IBHS licensed. This new language makes it sound more like it is only for those who provide MA and are doing IBHS services. Is that correct or does it still extend to anyone in the state providing ABA?
- 4.) Page 63 sections (e) (d), Here it talks about group supervision ... however for all of the previously listed supervision requirements it states that supervision must occur off site with nobody other than the supervisor and supervisee present. When can we do group supervision? To what frequency can we do group supervision and does that count as individual? Could I as the clinical director conduct supervision for all of my behavior analysts twice a month to meet their supervision requirement? And can they in turn conduct group supervision for their team of RBTs?

Thank you in advance for your time,

Gerald Everette, MA, BCBA, LBS



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