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Subject:

FW: [External] Clinical Director Qualifications for proposed regulations

From: [bhrsdirector@thesterncenter.org](mailto:bhrsdirector@thesterncenter.org) <[bhrsdirector@thesterncenter.org](mailto:bhrsdirector@thesterncenter.org)>  
Sent: Friday, July 12, 2019 1:34 PM  
To: PW, IBHS <[RA-PWIBHS@pa.gov](mailto:RA-PWIBHS@pa.gov)>  
Subject: [External] Clinical Director Qualifications for proposed regulations



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Hello,

I was seeking clarification regarding the requirements for the role of Clinical Director in the proposed regulations on pg 58.

(c) By July 1, 2022, a clinical director of an IBHS agency that provides ABA services shall meet one of the following: (1) Be licensed in this Commonwealth as a physician practicing psychiatry, psychologist, certified registered nurse practitioner, professional counselor, marriage and family therapist, clinical social worker, behavior specialist, social worker or other professional with a scope of practice that includes overseeing the provision of ABA services and have a certification as a BCBA or other graduate-level certification in behavior analysis that is accredited by the National Commission for Certifying Agencies or the American National Standards Institute and a minimum of 2 years of experience in providing ABA services.

Would a person holding a PA Behavior Specialist License, graduate level certificate in ABA from a NCCA approved program and over 2 years experience providing ABA be qualified to act as a Clinical Director to oversee IBHS?

Thank you for your time and clarification,

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