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Independent Regulatory  
Review Commission

Kathy Cooper

**From:** Scott Schalles  
**Sent:** Tuesday, August 6, 2019 1:22 PM  
**To:** IRRC  
**Subject:** FW: Final Form IBHS Regulations Regulation #14-546 (IRRC #3209)

**From:** Amy Gill [mailto:agill@familybehavioralresources.com]  
**Sent:** Tuesday, August 6, 2019 1:20 PM  
**To:** cmalecki@pa.gov; Michelle Elliott <melliott@irrc.state.pa.us>; Scott Schalles <:sschalles@irrc.state.pa.us>; RA-PWIBHS@pa.gov  
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**Subject:** Final Form IBHS Regulations Regulation #14-546 (IRRC #3209)

To Whom It May concern:

We are seeking clarification regarding the new IBHS bulletin in the following areas:

1. Can a BCBA fulfill the Clinical Director role for IBHS-individual services not ABA? (Page 31)
  - a. A BCBA is not listed as a requirement, however, the BHT can function as a BCAT or a RBT. Both the BCAT and the RBT require BCBA oversight.
1. The BHT positions. (Page 46)
  - a. The BHT/RBT supervision requirements need to be clarified, as the BACB requires higher supervision standards than the proposed regulations.
  - b. The BHT/RBT positions, while only requiring a high school diploma and certification, require a significant amount of supervision from a BCBA. This will cause a final burden to agencies.
  - c. If the BHT's highest level of education is a high diploma, is this individual required to be certified as an RBT, or is the only requirement 40 hours of training from the RBT task list?
1. Will CARF be allowed as accreditation agency or will agencies need to have a waiver?
2. The process for submission of the IBHS service description needs clarified.
  - a. Does the SD need submitted to the county and MCO for approval before the state?
  - b. The specific process needs outlined.
  - c. What is the timeline for submission?
  - d. Can the IBHS SD be added to existing OP SD?
1. How does IBHS impact Act 62 guidelines?
2. The differences between Behavior Analytic Services and Behavior Consultation-ABA Services as described in the Preamble need to be clarified. (Preamble Page 16)

Sincerely,

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