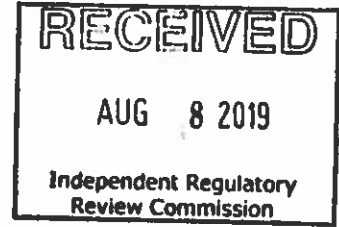


3209

Cheryl Yohn

From: Stone Heather <HStone@nisarinc.com>
Sent: Thursday, August 8, 2019 5:55 PM
To: IRRC
Subject: IBHS Regulations 5240 #3209



5240.23 Service Provision –

(b) Prior to the completion of the ITP, IBHS can be provided if there is a treatment plan for the individual services, ABA services or group services provided.

- How can IBHS be provided (if there is a treatment plan) prior to the completion of an ITP? How is a “treatment plan” different from an ITP?

5240.71 Staff Qualifications for Individual Services –

(b) [Behavior Specialists] Individuals who provide [individual] behavior consultation services to children diagnosed with ASD for the treatment of ASD shall meet the qualifications for [a behavior specialist analyst] an individual who provides behavior analytic services or behavior consultation – ABA in 5240.81(d) or (e).

- Why are ABA staff qualifications required under individual services, even for BSC ASD under individual services? ABA services are not required to address all behavioral needs for children diagnosed with ASD – services need to meet the individual needs of children on the spectrum regarding treatment modalities. Requiring staff to licensed staff (outlined in Act 62) would be sufficient to meet the needs of children with ASD under individual services.

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