

RECEIVED # 3209
AUG 9 2019
Independent Regulatory
Review Commission

Cheryl Yohn

From: Gray, Antoinette <agray@merakey.org>
Sent: Friday, August 9, 2019 4:03 PM
To: IRRC; cmalecki@pa.gov
Subject: Merakey Questions for Intensive Behavioral Health Services #14-546 (IRRC# 3209)

Good Afternoon,

Merakey continues to support the IBHS regulations as they promote greater accountability and based on the presumption they will be associated with acceptable reimbursement.

Please accept the following questions and request for clarification concerning Intensive Behavioral Health Services #14-546 (IRRC# 3209)

Provider Eligibility	5240.3	Does the agency have an option to choose the qualifying license within the agency to submit while working towards the IBHS license?
Provider Eligibility	5240.3	Request for clarification on the statement: regardless of when a license is obtained an IBHS agency shall comply 90 days after the effective date of adoption of the regulations.
Provider Eligibility	5240.3	Will there be clarification on how to manage the regulations within BHS exception programs?
Staffing	5240.11 5240.71	The requirement for a clinical or mental health practicum will eliminate qualified staff for services who are already providing the service under BHS or exception programs.
Staff Training Plan	5240.1	Would the department consider training plans based on position within IBHS and not each individual staff?
Assessment	5240.21 5240.85	Would the department consider removing the language requiring an assessment to be updated if no progress is made within 90 days? This language is in the 5240.22 and 5240.86. Updating the assessment will take clinical treatment time away from the identified child, youth, or young adult.
Service Provision	5240.23	Clarification on IBHS shall be delivered in home or community based, clinically appropriate setting. Does community-based include school?
Individual Treatment Planning	5240.22 5240.86	Regarding the request for the number of hours in each setting, will we be able to move the hours around to provide more school time vs. home time if needed due to a crisis, in order to best meet client needs?
Staff Qualifications	5240.7	Can a qualified BC-ABA or BHT-ABA work within individual services if their supervision is managed by a clinical director qualified under ABA services?
Supervision	5240.71 5240.82	The IBHS regulations increase qualifications and training requirements. The increase in face to face individual supervision decreases the ability to meet the clinical needs of the population we serve. Will the department consider allowing the supervision required monthly to be group supervision?

Staff Training Requirements	5240.13 5240.73 5240.83	Will there be a process regarding training requirements as the department works to approve the submitted trainings by IBHS agencies? Will current agencies be unable to train staff until all trainings are department approved?
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Thank You,

A. Gray

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