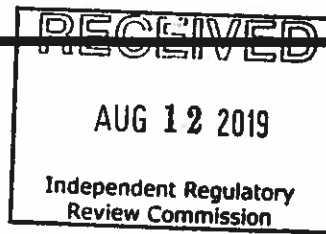


3209

Kathy Cooper



From: Susan <sasy302@aol.com>
Sent: Monday, August 12, 2019 7:15 PM
To: IRRC
Subject: IBHS regulations

The final regulations as they stand have too many road blocks to allowing a greater number of children to access services. As a BCBA and director of a BHRS agency that services children with Autism I can attest that the new regulations will add increased financial burden, while not increasing the quality of services. The increased supervision requirements, not allowing for group supervision, and in general implementation of all the new regulations will be cost prohibitive to most agencies. While I have numerous concerns about all the new regulations, I do not have the time as some agencies have had to break down an 80 page document in a month and make detailed responses to all the anticipated problems and concerns. Just the time frame for implementing this with all the BHRS agencies in the state seems unrealistic from past experience of implementing new regulations like Act 62. The Board of Medicine still takes months to get a single BSC licensed, there is an ever increasing back log of children with ASD who can't not access services as a result of increased regulations. I have been working in BHRS for over 20 years and from my professional experience this new regulation will do nothing to help more children access services as intended, but to deter more agencies from providing this service. For instance, there will not be enough BCBA's to do all that will be needed, and no amount of increase payments will fix the Problem as these individuals just do not exist. As a BCBA I receive multiple job offers daily all over the country due to the lack of professionals in this field. This is just one of hundreds of concerns I've come across as I have begun to read this complex and untested regulation. Much more time is needed to address all the issues that I and others have written about, and a much slower, step by step approach should be taken to a program that affects so many children. It appears this is a very unpopular change from talking to other agencies and would suggest that polling and surveys be sent to programs before moving forward to get a real idea of what drastic and detrimental changes this will cause. Much more caution needs employed!

Thank you,

Susan Stewart-Bayne MEd., BCBA, LBS
Co-Director of Alliance Health Wraparound Allegheny Inc.

Sent from my iPhone