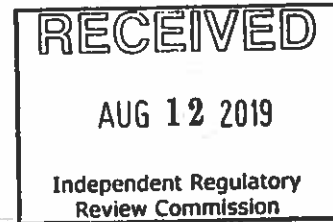


3209

Cheryl Yohn

From: Scott Schalles
Sent: Monday, August 12, 2019 8:27 AM
To: IRRC
Cc: David Sumner; Fiona Cormack
Subject: FW: IBHS regulation comment



3209

From: christie seiler [mailto:anchpc@lycominghealthyliving.com]
Sent: Friday, August 9, 2019 11:32 AM
To: Scott Schalles <sschalles@irrc.state.pa.us>
Subject: IBHS regulation comment

To whom it may concern,

This letter is in reference to the new proposed IBHS regulations by The Department of Health and Human Services. Please be aware that I am opposed to much of what is being suggested. The reasons being that as a psychologist, it is a violation of the Professional Practice Act for Psychologists. As you know, it states clearly that a Licensed Psychologist has the right to practice and supervise ABA providers. It makes little sense to me that the new regulations would allow BCBA's to practice independently without a board to govern them. The scope of the license they obtain (i.e., their BSL) does not include the provision of services as outlined by the proposed regulations. I strongly believe that that these proposed regulations are in violation of current statutes developed to protect the public and a violation of my rights to practice. I have supervised ABA service for approximately 15 years and have been successful in helping hundreds of Autistic children. Currently, we have approximately 80 children in our BHRS program which we are seeing success in the home and school environments. Should these new regulations be passed, our children are at risk of losing their providers and it will be very difficult to appropriately place them.

Thank you for your consideration,

Dr. John S. Neil
PA. Licensed Psychologist

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