

3209

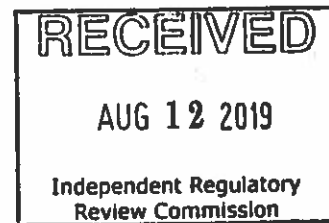
Cheryl Yohn

From: Stone Heather <HStone@nisarinc.com>
Sent: Monday, August 12, 2019 2:05 PM
To: IRRC
Subject: RE: IBHS Regulations 5240 #3209

To clarify, our agency is expressing opposition to the No. 3209 Department of Human Services #14-546: Intensive Behavioral Health Services regulations. In addition to my comments and questions below, implementing the regulations as noted in the draft will result in continued access issues (due to enhanced qualification and training requirements that are cost-prohibitive for agencies and direct line staff) for children requiring ABA services. For example, the timeline and cost for acquiring the behavior specialist license (under Act 62) is minimal compared to the timeline and cost for acquiring a BCBA, yet we still have hundreds of children waiting for ABA and non-ABA services with current Act 62 regulations. Allowing for a deadline of 2022 will not likely exponentially increase the availability of BCBA or BCaBA staff.

Please include this with my previous comments listed below.

Heather Stone, M.A., L.B.S.
Clinical Director
Nisar Health and Human Services



From: Stone Heather
Sent: Thursday, August 08, 2019 5:55 PM
To: 'irrc@irrc.state.pa.us'
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 BSC staff to be licensed (outlined in Act 62) would be sufficient to meet the needs of children with ASD under individual services.

Heather Stone, M.A., L.B.S.
Clinical Director
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