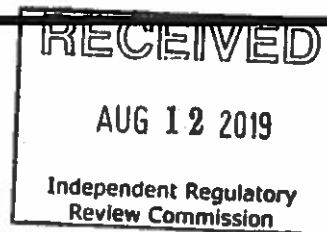


Kathy Cooper

3209

From: Steven Kossor <sakossor@ibc-pa.org>
Sent: Monday, August 12, 2019 11:31 PM
To: IRRC
Subject: IRRC #3209 re 14-546



Please add the following comments and questions to those already submitted to the IRRC #3209 regarding the proposed "Intensive Behavioral Health Services" (14-546)

- An Order for treatment is written by "any qualified licensed professional."
 - Does this include Licensed BSCs?
 - Do prescribers have to be **enrolled in MA** to prescribe IBHS as they do now for BHRS?
 - Doesn't the Medicaid Act require prescriptions for EPSDT funded treatment to be written by "a **licensed practitioner of the healing arts,**" – isn't that a psychologist or a MD in PA?"
- A licensed prescriber can **Order** (prescribe) IBHS without ever performing an Evaluation.
 - This is *worse* than "putting the cart before the horse." It's like unhitching the horse from the cart and pushing it down the hill "because it will get there faster." Whose needs does this short-sighted and dangerous new "best practice" standard serve?
- Children with ASD diagnoses can receive ABA or non-ABA (Individual) services and children with other diagnoses can receive ABA or non-ABA (Individual) services.
 - If a child with an ASD diagnosis receives non-ABA services (for the treatment of aggression, or ADHD symptoms, for example), can the BSC provider meet the standards for a provider of **Individual** services, rather than a provider of **ABA** services?
 - If a BSC provides services for the treatment of ADHD, or physical aggression, or other services **not** for "the treatment of ASD" can the BSC provider meet the standards for a provider of **individual** services, no matter what the diagnosis of the client being treated?
- An IBHS agency is an "entity" (defined in Chapter 20) that provides IBHS (defined in Chapter 5240). Chapter 20 does not refer to a psychology group practice (enrolled in MA) or an individual licensed psychologist (enrolled in MA) as an "agency."
 - Is a psychology practice group (enrolled in MA) or an individual psychologist (enrolled in MA) considered an "agency" under Chapter 20?
 - **How**, exactly, will a psychology group practice (especially one that has been delivering BHRS with a high level of fidelity and success for decades), or an individual licensed psychologist (especially one who has been delivering BHRS with a high level of fidelity and success for decades), become an IBHS agency? **Why hasn't this been explained fully?**
 - What is the rationale for refusing to permit licensed psychologists (individually or in group practices), especially those who have been enrolled in Medicaid and have been delivering BHRS with a high level of fidelity and success for decades, to continue delivering these psychological services under the name "Intensive Behavioral Health Services" without requiring them to obtain another license? Why can't they be "grandfathered" as IBHS providers, as long as they comply with the IBHS *quality* standards?
- Both the House and Senate in Pennsylvania currently have resolutions investigating the reasons for the lack of mental health professionals in Pennsylvania. There is a severe lack of qualified mental health professionals in Pennsylvania, especially for those of limited economic means, like almost all of the children enrolled in Medicaid throughout Pennsylvania.

- Why then is it necessary to require licensed psychologists to obtain **another** license, from the DHS in **addition to their existing license issued by the Department of State as a practitioner of the healing arts**, especially when there is an admitted shortage of mental health treatment professionals available in Pennsylvania? If those licensed psychologists want to continue providing psychological treatment to children, especially those enrolled in Medical Assistance, who are *already* experiencing a severe shortage of mental health treatment professionals, why not “Grandfather” them, especially if they’ve been enrolled in Medicaid and providing excellent mental health treatment and behavioral support (called BHRS or IBHS) to children successfully *for decades*?
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Thank you.
Best wishes.
Steve Kossor