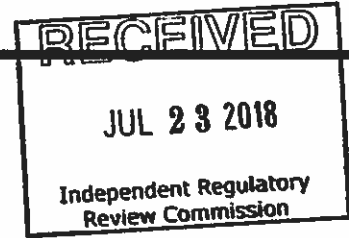


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Kathy Cooper



From: Reddy, Cynthia <Cynthia.Reddy@Steward.org>
Sent: Saturday, July 21, 2018 1:25 AM
To: IRRC
Subject: IBHS Regulations

I am writing in regard to the new proposed regulations for the IBHS regulations. In particular sections 5240.7 Coordination of services and Group services provision 5240.107.

5240.7 Coordination of services

The IBHS agency shall have written agreements to coordinate services with other services providers including the following

- A. Psychiatric inpatient facilities
- B. Partial hospitalization programs
- C. Psychiatric outpatient clinics
- D. Crisis intervention programs and
- E. Mental health and intellectual or developmental disability case management programs.

My concern related to written agreements between services providers that can create a monopoly in certain areas of the states to the disadvantage to small IBHS companies. This guideline raises real concerns of conflicts of interest with Federal Anti-kick back laws. The coordination of services makes no mention or even a reference to educational needs and coordination with the Department of Education. There is still a known deep gap between services coordinated with the Behavioral services and the Department of Education and Early Intervention.

Section 5240.107 Group Services provision

One of the greatest challenges for children with autism is social skills. Medicaid currently does not address or directly reimburse for social skills classes and usually is administered by speech therapists or services that must be paid for cash by parents. The children are usually with other children with autism and lack the ability to include neurotypical children. Is this provision going to directly reimburse for social skills and how with the provision going to reimburse if neurotypical children are included as models outside of a school or daycare setting such as after school programs? In regard to schools with requirements for group services in school settings. What provisions are in place if a school refuses to have IBHS come into the school? This is extremely common unfortunately and what measures are in place with the Department of Education? This guideline is very vague regarding this concern. The last concern is what if parents don't want to use the IU? There has been much debate over decades about their quality and lack of coordination with other services agencies and the IU.