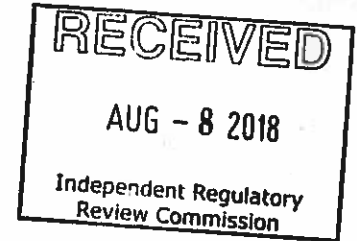


14-546-01 3209

Champa, Heidi

From: Amy Gill <agill@familybehavioralresources.com>
Sent: Friday, August 03, 2018 3:03 PM
To: PW, IBHS
Subject: IBHS Public Comment



To Tara Pride:

I am writing in regards to the proposed changes with Intensive Behavioral Health Services. I am excited for many of the changes as they will increase the quality of care for consumers with behavioral needs, particularly the mandated requirements for the Clinical Director to hold a BCBA or specific training in Applied Behavior Analysis. However, I have concerns regarding some of the requirements not meeting the Behavior Analyst Certification Board standards. The following are the list of my concerns:

Supervision Requirements For Behavior Tech-ABA:

The IBHS staff qualifications state that at BT-ABA needs to obtain behavioral analysis supervision (RBT, BCAT, et.) within 2 years from effective date of the regulations. According to the BACB, an RBT requires supervision for 5% of the total amount of hours worked within one month, including a minimum of 2 face-to-face contacts by the supervisor. For example, an RBT working 37.5 hours per/week (150 hours per month), would required 7.5 hours of supervision, provided by a BCBA, per month. The current proposed standards documented in the IBHS regulatory bulletin do not meet BACB standards. The bulletin includes a requirement of 4 hours of supervision per month and indicates that supervision may be provided by an LBA. This would also be true for an ABSA holding a BCABA that has not completed the 1,000 hours of direct clinical work.

Training Requirements for the BSC/BSA position:

The regulatory bulletin states that the BSC/BSA will require 16 hours of job related training per. However the regulatory bulletin does not state if this is for full time or part time positions. Does this apply to BSC/BSA's that work full time and part time or is there consideration for less training hours if a person is not working full time hours. For example, if a BSC/BSA works less than 10 hours a week, would this staff still required 16 hours of training. If the 16 hours a year of training is for both full time and part time BSC/BSA's this would be an increased cost to an agency.

ISPT Meetings

In regards to recurring IBHS and ABA consumers will there be the requirement of ISPT meetings every 6 months with managed health care? Would the consumer need to be evaluated again if the consumer's treatment team felt that the consumer needed additional hours or a decrease in hours. This was unclear in the regulatory bulletin and we are asking for clarification.

Clinical Director Responsibilities

The Clinical Director has direct oversight of the BSC/BSA. Is there regulation of how many BSC/BSA's that a Clinical Director can oversee? We are asking due to the number of supervision hours that are required for a BSC/BSA. In addition, the regulatory bulletin states a requirement of completing monthly case reviews. The requirement for these is unclear. Will the clinical director be required to complete one case review per clinician per month or complete case reviews on all consumer's each month?

Site Based Programs

The regulatory bulletin states that Group Services will replace Summer Therapeutic Activities Programs (STAP). In regards to current service descriptions will STAP need to be included in the IBHS service description? Also, Group Services section mentions STAP, but no other site based or social skills programs. Will programs that focus on targeting skill deficits and not social skills be included in "Group Services"? For example, Family Behavioral Resources' Endeavor Program has requirements that differ from

STAP and do not fall into the Group Services requirements. Would this be included in the IBHS service description or continue as it's own stand alone program?

Reimbursement Rates

The regulatory bulletin does not mention an increase in reimbursement rates. With the focus on BCBA's providing ABA treatment an increase in reimbursement rate needs to be discussed in order to find qualified staff to provide these services.

Sincerely,

—
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