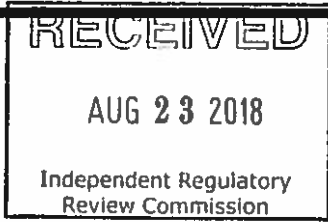


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Kathy Cooper

From: Brittany Lane <brittanylane458@yahoo.com>
Sent: Thursday, August 23, 2018 10:24 AM
To: IRRC
Subject: IBHS Regulations



I am emailing my concerns regarding the proposed lowering of ABA standards for supervision. I want to point out that in any other profession in the medical community has standardized education levels and licensing not something in between. There are reasons for that ----called ----quality. The second point I want to make is that this proposed lowering was to get more kids access to service. That is sort of a wrong perception because as you see PA has been behind for years and operating on worse standard than these and if you track the success rates they are poor on a good day. This is nothing more than a political move on part of the OMSAS to band aid complains of poor services from parents and and after being sued and losing. By the way if parents want to know that state did a research study over a decade ago and found ABA the best treatment so what did they do. NOTHING. They approved the garbage standard we have now back then. THIS IS LEGALIZED MEDICAL NEGLIGENCE. I find it appalling that you claimed to do all this research from different states and it clear you picked and chose what you wanted to be relevant. There is a whole profession out there, research from top international universities that all say the same thing. So this mockery of what you call IBHS is really the same as the horrible BHRS we have with a few changes to make yourself try to look good to try and quiet a lot of angry parents. Yah your kid will get services but their crappy and will continue to be crappy as my taxes go up. My taxes are going up because when you put garage in you get garbage out. Kids don't make progress are in the system longer and never achieve a higher potential had they had a BCBA and RBT. Research has shown this time and time again. So these proposed lower standard is a free ticket for companies to continue to rip off families, Medicaid and insurance company all approved by the State.

I strongly oppose any lowering of any standards so businesses and the state can continue rip off kids and families while stealing money they don't deserve as payment from Medicaid and insurance company claiming its all ABA which it is not. And that comes out of my pocket --- the parent. I think a lot of parents should and will be retaining attorneys if these proposed regulations are not amended and suing Medicaid for failure to provide appropriately trained and credential providers no different than any other medical profession.