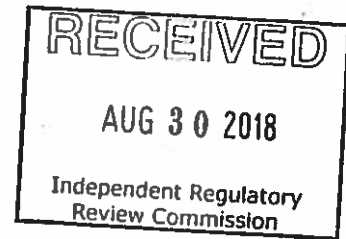


14-546-48 3209

**Champa, Heidi**

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**From:** Verdeur, Catherine <Catherine.Verdeur@uhsinc.com>  
**Sent:** Monday, August 27, 2018 4:07 PM  
**To:** PW, IBHS  
**Subject:** Comments Regulation No. 14-546



Good afternoon,

Please see below comments regarding Regulation No. 14-546:

**Comments:**

1. The statements about the costs expected to be offset as a result of expected savings, as a program we aren't sure if this is going to be possible given the requirements. Will there be a rate increase?
2. With the ISPT meeting prior to start of services eliminated we are concerned that this will create confusion and an unstructured team as we tend to use this time to develop goals and to explain the program. While eliminating the ISPT prior to services starting might increase access, it may create confusion among the team and lead to unfocused treatment.
3. Is the ABSA an assistant BCBA type of role for BSL?
4. The "written order" for services from a licensed professional – is this licensed professional going to be trained by the state to collect the information for the written order? And can the licensed professional that writes the order be the BSC or MT? If so, we are concerned that clinicians will not be objective in making their recommendations for services.
5. Main site and satellites needing to be licensed, what is the impact of this and please define the terms "entity" and "agency".
6. The training that can be shared between agencies – how will this be shared and will additional training is going to be provided by the department?
7. The 2 phone contacts within 30 day after discharge – who does this and can we bill? Is Case Management as a billable service returning?
8. BSC needing a practicum and one year full time experience will limit the amount of qualified BSCs.
9. General concern about the amount of training the draft regulations require – will the state be offering trainings statewide or creating trainings that providers will be able to have clinicians access?

Regards,  
Catherine

Catherine Verdeur, Psy.D.  
BHRS Program Director  
Foundations Behavioral Health  
833 East Butler Avenue  
Doylestown, PA 18901  
215-345-0444 ext. 109  
215-345-3529 fax

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