

14-546-62 3209

Champa, Heidi

From: Will Ouellette <wouellette@cbhsinc.com>
Sent: Friday, August 31, 2018 2:32 PM
To: PW, IBHS
Subject: to: Tara Pride IBHS Comment



Children's Behavioral Health Services Inc. has been a BHRS provider in Northeastern Pennsylvania since 2000. We have very high hopes for IBHS, but as these proposed regulations evolve so do our concerns. To state that, "The proposed regulations will also benefit the 228 providers that are currently providing BHRS", is an extremely cavalier statement. The proposed regulations will increase costs significantly for providers. Providers will be required to hire additional clinical staff with higher credentials that will command higher salaries. Providers will need to hire additional administrative staff to track and record the additional quality measures and requirements. It's impossible for an agency to strategically plan for IBHS without knowing what the reimbursement rates will be. BHRS providers across the state are operating on razor thin margins due to the lack of increases in funding for over 24 years.

Requiring BCBA's for all providers serving children with autism will be a road block for many providers, and families they serve. There are a small number of BCBA's currently licensed in the state of Pennsylvania. According to the BCBA/BCaBA Registry* there are 1315 BCBA, BCBA-D and supervised BCaBA certificants in the state of Pennsylvania. Many of these 1315 individuals will not be seeking a position with an IBHS provider, and the ones that do will expect higher salaries than the current BSC position in BHRS. A BCBA in the private sector or working for a school district can command a salary nearly double that of a current BSC.

There is one chance to get this right. Failing to properly fund IBHS, or setting the minimum requirements for staff too high will leave the state with a shortage of providers. Instead of these regulations benefiting children, families will struggle to find providers with availability and the special needs children of Pennsylvania will go without treatment.

Sincerely,
Will Ouellette, CEO
Children's Behavioral Health Services Inc.

*This Registry is a listing of current BCBA, BCBA-D and supervised BCaBA certificants in the state of Pennsylvania. The information is current as of August 23, 2018. <http://info.bacb.com/o.php?page=100155&by=state>

P. Will Ouellette III
Children's Behavioral Health Services Inc.
Chief Executive Officer
104 Woodward Hill Road
Edwardsville, PA 18704
(570) 714-7230 Office
(570) 905-0458 Cell
pwouellette@gmail.com
wouellette@cbhsinc.com