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Independent Regulatory
Review Commission

From: Melanie Duncan <Melanie.Duncan@mstservices.com>
Sent: Friday, August 31, 2018 1:18 PM
To: PW, IBHS
Subject: Comment on Department of Human Services (DHS) added Chapters 1155 and 5240 relating to IBHS to Title 55 of the Pennsylvania Code

Hello Tara Pride,

I am adding comment to the Department of Human Services (DHS) added Chapters 1155 and 5240 relating to IBHS to Title 55 of the Pennsylvania Code.

Below are our comments.

1. The billing regulations seem to allow the state to defer to the EBT models, which is great, but will this cover working with family members and other ecological players even if the client is not involved in those sessions?
2. Will the new "comprehensive face-to-face assessment tool", be something the EBT gets to identify and use or will that be state-driven tool?
3. For section 1155.37 Limitations (1), it says "services provided to a child, youth, or young adult must be in the agency service description." What about services provide to the adult caretaker or collateral contacts? Is this limitation excluding them?

Thanks for your time and please let me know if you have any questions,

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