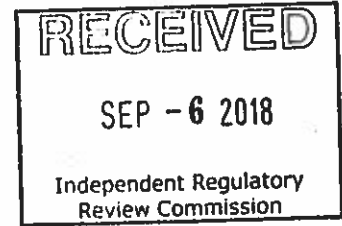


14-546-80 3209

Champa, Heidi

From: Beth Kuhns <beth.kuhns@adelphoi.org>
Sent: Tuesday, September 04, 2018 2:41 PM
To: PW, IBHS
Subject: IBHS comment regulation No. 14-546



Dear Ms. Pride,

On behalf of Adelphoi, we appreciate the opportunity to provide comment on the proposed IBHS regulation No. 14-546. Please see input below.

IBHS regulations public comments

1155.32

*States prescription from a licensed professional;

Can the prescription, written by a non-licensed individual, be reviewed and signed off by a licensed professional?

Face to Face Assessments

*EBT section identifies assessments to be completed within 15 days. ABA Services did not seem to have a timeframe listed for face to face assessments. Group Services lists within 5 days. A more consistent timeframe is recommended.

5240.22 Individual Treatment Plans

*Identifies an ITP including a safety plan.

Cases may exist in which a safety plan is not warranted. We recommend the need for a safety plan be based on the identification of a threat to safety of self or others, maintaining the purpose of a safety plan providing urgency and a higher level of clinical attention, case specific.

5240.32 Discharge Summary

*Complete at least 2 phone calls within the first 30 days after discharge.

Is this a requirement for EBT programs as well? Are these calls for successful and unsuccessful discharges? What is the expected degree of attempts and documentation for no successful family contact?

5240.72 Supervision

*EBTs have specific supervision requirements identified as part of model adherence and licensure practices. We recommend the supervision requirements of the EBT be acceptable and recognized.

We thank all involved parties for the time and attention toward developing these proposed regulations and appreciate consideration of these comments.



Beth Kuhns

Clinical Director

Adelphoi Village

Office: 724-322-7700

Fax: 724-520-1878

www.adelphoi.org



****This email and its attachments may include information from Adelphoi USA that is confidential and may be protected under federal and/or state law. This information is for the use of the intended addressee only. The improper use of this information is prohibited. If you have received this email in error, please notify our Privacy Officer by telephone at 724-804-7000 immediately, or by email at privacyofficer@adelphoi.org and immediately delete the email. Mailing address: Adelphoi USA, 1119 Village Way, Latrobe PA 15650.****