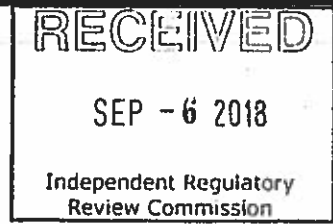


14-546-75 3209

Champa, Heidi

From: Pickering, Beth <pickeringba@ccbh.com>
Sent: Tuesday, September 04, 2018 11:53 AM
To: PW, IBHS
Cc: Brion, Jennifer; Carlson, Donna
Subject: RE: IBHS comment
Attachments: IBHS Comments-Chester County.docx



Please also be advised, attached are comments from Chester County who asked they we submit on their behalf.

From: Pickering, Beth
Sent: Tuesday, September 4, 2018 11:51 AM
To: RA-PWIBHS@pa.gov
Cc: Amy Marten-Shanafelt <amshanafelt@blairhealthchoices.org>; Carlson, Donna <dcarlson@chesco.org>; DiMattio, John <JDiMattio@eriecountypa.gov>; Gallagher, Jim <jgallagher@nbhcc.org>; Jacque Miller <jmiller@joinder.org>; Jeff Hartzell <jhartzel@cmpmhmrcog.pa.us>; Maguire, Taryn M. <TMMaguire@YorkCountyPA.gov>; Singley, Lydia <lsingley@countyofberks.com>; Walker, Sally <swalker@bharp.org>; Bott, Amber <botta@ccbh.com>; Natalie, Jeffrey <nataliej@ccbh.com>; Wydeen, Christine R <wydeencr@ccbh.com>; Gilberti, Carole <gilbertica@ccbh.com>; Myers, James B <myersjb2@ccbh.com>; Stehley, Felicia J <stehleyfj@ccbh.com>; Shaffer, Sherry <shaffersl@UPMC.EDU>
Subject: IBHS comment

Good Afternoon,

Community Care has completed its review of the proposed IBHS regulations. This review resulted in several over-arching questions/comments that have been incorporated into a cover letter. Within the attached pdf document, we have inserted many content specific comments, questions, suggestions using the sticky note option. You may identify the notated language by the yellow highlighted text. We have also created a spreadsheet which identifies the specific page number, the citation language and the corresponding comment.

Beth Pickering

Regional Director | [Community Care Behavioral Health Organization](#) | 1 East Uwchlan Avenue, Suite 311 | Exton, PA 19341
T: 610-594-2804 | F: 1-888-589-6559

This email contains confidential information of the sending organization. Any unauthorized or improper disclosure, copying, distribution or use of the contents of this e-mail and, if applicable, attached document(s) is prohibited. The information contained in this e-mail and attached document(s) is intended only for the personal and confidential use of the recipient(s) named above



THE COUNTY OF CHESTER



COMMISSIONERS:
Michelle Kichline
Kathi Cozzone
Terence Farrell

DEPARTMENT OF HUMAN SERVICES

KIM BOWMAN, M.S.
Director

DONNA A. CARLSON, MS
Deputy Director
Managed Behavioral Healthcare

DEBRA A. MACCARIELLA, M.Ed
Administrative Deputy Director

3209

Chester County Department of Human Services has reviewed the Chapters 1155 and 5240 relating to intensive behavioral health services. We have some additional questions in addition to the questions and comments submitted by Community Care Behavioral Health Organization.

*There is a statement that says that IBHS includes evidence-based therapy (EBT) services and group services. Will all EBT services and group services within each county now also have to adjust their policies, procedures, and programming to these new regulations?

*For the allowing of an IBHS agency to continue to serve a child, youth, or young adult after they are discharged for 90 days, does this require an open authorization or will there be a process in place, new code, etc. for this somewhat of a IBHS booster session?

*Will the concept of a "Licensed BSC" now be obsolete?

