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Champa, Heidi

From: Jerome Campbell <jcampbell@sunnydays.com>
Sent: Tuesday, September 04, 2018 10:45 AM
To: PW, IBHS
Subject: Proposed Rule Making - Intensive Behavioral Health Services - Public Comment

Discharge – 5240.31/32

Is there any reimbursement for the proposed minimum of two (2) telephone contacts with the first 30 days after discharge to monitor the child’s maintenance of progress?

Individual Services – 5240.71/73/75

Is one of the proposed rule making changes effectively going to require all BHTs to obtain certification from either a Nationally-recognized certification board or the PA Certification Board and without a certification, the BHT will not be able to continue providing service beyond two years from the effective date of the proposed rulemaking?

ABA – 5240.81/83/87

The proposed rulemaking training requirements for BHT-ABA consist of the following:

- 30 hours of Dept.-approved training prior to working independently
- 24 hours of Dept.-approved training with the first 6 months of employment
- 20 hours of training related to ABA that is approved by the BACB or the Department (if one doesn’t have a undergrad certification in behavior analysis)
- 74 hours of training in the first year of employment?

This is an excessive amount of training in any one year, let alone the first year of employment. Training in and of itself is an expense as is the lost productivity attributable to the time employee is in training versus providing services! All of which is predicated upon abysmally low reimbursement rates of \$8.40 – 8.65/15 minutes of service for a BHT!

Training requirements are effectively unfunded mandates, which in a reimbursement environment as I’ve described, will most certainly create barriers to service delivery – specifically in reference to how quickly families can begin to receive service and how many families can be served by any given agency, in light of said training requirements.

Jerome Campbell
Director, Sunny Days
610-449-1600, x422
888-571-3818 (toll-free)
267-880-3361 (fax)
www.sunnydays.com
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