

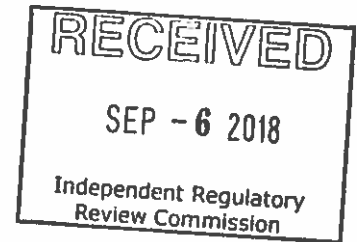
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**Champa, Heidi**

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**From:** Cathy DeGuire <cdeguire@twponessa.com>  
**Sent:** Tuesday, September 04, 2018 3:55 PM  
**To:** PW, IBHS  
**Cc:** Robena Spangler  
**Subject:** Questions/comments regarding IBHS  
**Attachments:** IBHS Proposed Rule Making.docx



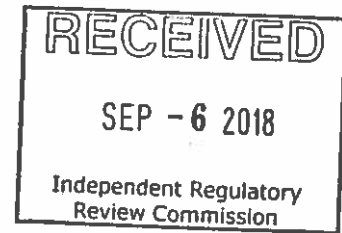
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## IBHS Proposed Rule Making



### Payment for IBHS

- ISPT meetings and paperwork appear to be eliminated. How often does a BPE need to occur for continuation of services?
- Will the determination to approve or deny services be based solely on the BPE? If not, what other feedback will be required?
- Will the reimbursement rate for services be increased to account for the additional certification required for staff to provide the services?

### Staffing and Supervision

- What will be the certification and credentialing requirements for those supervising the BSCs and BHTs?
- What exactly will the State specific certification by the PCB look like? When can we expect to know these requirements?

### Discharge

- Who is expected to be making follow up calls with discharged clients? And is there reimbursement for this monitoring?
- Will exceptions to this requirement (follow up calls) be made for clients who are discharged for noncompliance, not returning calls, have disconnected numbers, transferred their services to another agency?

### Individual Services

- What are the requirements needed for a behavior specialist providing services to a child diagnosed with autism? There is a reference to "shall require the same qualifications as a behavior analyst that provides ABA" What exactly is that?
- Will the Behavior Specialist License (BSL) that was created by the state in order to provide BSC services to a child diagnosed with autism now be irrelevant?

- How does the state anticipate the new certification requirements will affect client's wait time for services?
- What does a "behavior analysis certification" for a BHT entail?

#### **ABA**

- Can a Behavior Specialist Analyst who is licensed continue to provide services to clients with an autism diagnosis without an ABA certification?

#### **EBT**

- Would like some elaboration on this service. What will be required of the agency in order to provide play therapy, CBT, etc... Is this on an Outpatient type level of service or replacing Mobile Therapy?