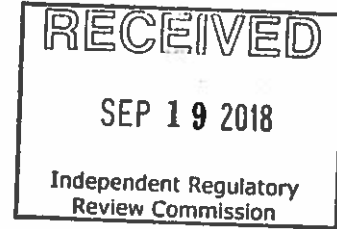


14-546-106 3209

SEP 17 2018

Champa, Heidi

From: Pride, Tara
Sent: Monday, September 17, 2018 9:09 AM
To: PW, IBHS
Subject: FW: IBHS Comments
Attachments: IBHS Comments.docx



From: William Martys [mailto:wmartys_shs@yahoo.com]
Sent: Tuesday, September 04, 2018 5:51 PM
To: Pride, Tara <tpride@pa.gov>
Cc: Tara Benson <tbenson_shs@yahoo.com>; Lisa Burke <lb.southwestern@gmail.com>; Suzanne Schollaert <suzanneschollaert@yahoo.com>
Subject: IBHS Comments

Hello,

On behalf of Southwestern Human Services, we are submitting these comments on the proposed IBHS regulations.

Thank You.

William R. Martys
Program Director

3209



These are areas of concern that need further clarification and consideration:

- Staffing qualifications are unclear
 - Are LPCs, LCSWs, LMFTs and LSWs qualified?
 - Is there current data to show the number of potential staff in the Commonwealth that meet the new requirements? Has that number been compared to the number of children currently being served through BHRS and the number of children in need of service, but not receiving the service due to the lack of available staff under the current BHRS requirements?
 - Will there be a grace period for current Behavior Specialists who wish to get certified?
 - What are the staff qualifications for non-ASD?
- How is medical necessity determined? Who is qualified to complete the assessments? Will there be standard lengths of care? Will there be a need for a child to be re-assessed to determine if there is continued medical necessity? If so, how often should the re-assessment occur?
- Discharge
 - Providers will be expected to contact families 2 times within 30 days of discharge, if it is deemed there is a regression services can resume. If the family contacts the provider within 60 days of discharge services can also resume? Is it expected that a clinician keep a spot open for all discharged clients in case they will need services in the future? This will potentially impact a provider's ability to accept new cases, given that staff availability is a major barrier.
- Additional costs
 - The new regulations have the potential to result in a financial hardship for agencies providing the service. In recent years, other regulatory changes have resulted in agencies no longer being able to financially sustain a BHRS program. How will IBHS be different? The goal of providers is to provide quality services that will positively impact children and families. Current lack of staff has resulted in many children waiting for extended periods of time without the services they need. Our concern is that if the financial burden becomes too much for providers and more agencies close their doors even more children in the Commonwealth will go unserved or under served.

In addition to individual items of concern outlined here and by other stakeholders, it is important that specific determinations be made based on; 1) The availability of staff in the Commonwealth to meet the qualifications that are adopted and 2) The ability of providers to offer the services in line with the new rulemaking without negative impact. If these concerns are not adequately addressed it could result in a reduction of services available to children in the Commonwealth, which should not be the intended result of these new regulations.