Webinar for Providers of Intensive Behavioral Health Services (IBHS) Applied Behavior Analysis (ABA) Services

January 10, 2020
Agenda

• Introduction
• Review of Available Resources
• IBHS Licensing
• IBHS Staff Qualifications
• IBHS Staff Training
• IBHS Staff Supervision
• Provision of ABA
• Question and Answer
Introduction
IBHS Regulations

Two chapters

• Licensing chapter (Chapter 5240)

• Payment chapter (Chapter 1155)
IBHS Resources
IBHS Resources

- IBHS Website
  [http://www.healthchoices.pa.gov/providers/about/behavioral/inbehavioralhs/index.htm](http://www.healthchoices.pa.gov/providers/about/behavioral/inbehavioralhs/index.htm)
- Previous WebEx’s and Training Materials
- Updated and New Resources
- IBHS Initial Outreach Letter
- Service Description Checklist
- License Application Instructions
- Behavioral Health Managed Care Organization Contacts and Counties Served
- County Administrators Contact List
- OMHSAS IBHS Contacts
- Frequently Asked Questions
- IBHS Department-Approval of Training
- IBHS Family Fact Sheet
- IBHS Draft Codes
- IBHS Resource Account RA-PWIBHS@pa.gov
- IBHS Training Resource Account RA-PWIBHSDepTrng@pa.gov
Intensive Behavioral Health Services

Intensive Behavioral Health Services (IBHS) support children, youth, and young adults with mental, emotional, and behavioral health needs. IBHS offers a wide array of services that meet the needs of these individuals in their homes, schools, and communities. IBHS has three categories of service: 1) Individual services which provide services to one child; 2) Applied Behavior Analysis (ABA) which is a specific behavioral approach to services; and 3) Group services which are most often provided to multiple children at a specific place. Evidence-based treatment (EBT) can be delivered through individual services, ABA services, and group services.

TRAINING & WEBINARS

Statewide Webinars

- Oct. 4 — 9 a.m.-noon
  Please register for the webinar at https://attendee.gotowebinar.com/register/847881019546919788

- Nov. 20 — 1-4 p.m.
  Please register for the webinar at https://register.gotowebinar.com/register/5100815511865420445

*After registering, you will receive a confirmation email containing information about joining the webinar.
IBHS Licensing
IBHS Licensing Process

• Service description submission
  – Submit regionally
  – Should address each service type provided

• Licensing application
  – Licensing applications are submitted to licensing administration.
  – Licensing application instructions can be found at: [http://www.healthchoices.pa.gov/cs/groups/webcontent/documents/document/c_291926.docx](http://www.healthchoices.pa.gov/cs/groups/webcontent/documents/document/c_291926.docx)

• Site visit
  – Site visits will be scheduled by OMHSAS field office representatives
Timeframe for an agency to obtain an IBHS license

- Agencies that currently provide IBHS and do not meet any of the below must obtain an IBHS license by January 17, 2020. This includes agencies that currently provide individual services, ABA services or group services and do not participate in the MA program.
- Unlicensed providers enrolled under the OMHSAS-16-07 bulletin and approved to provide ABA services must obtain a license by April 16, 2020.
- IBHS agencies that currently have a base mental health license, such as an outpatient psychiatric clinic, a psychiatric partial hospitalization program or family based mental health license, must obtain an IBHS license when their current license expires.
- Agencies that are currently approved to provide BHRS, but did not enroll under OMHSAS-16-07 or have a base mental health license must obtain an IBHS license by October 17, 2020.
- Agencies established after January 17, 2020, must obtain an IBHS license prior to providing IBHS.
IBHS Licensing

- All providers of IBHS, including ABA services, must be licensed. This includes providers who do not serve individuals with Medical Assistance (MA).
- Providers that obtain an IBHS license are not required to participate in the MA program.
- A provider can choose to provide only ABA services or ABA services and other IBHS.
IBHS Licensing

Outreach to providers that are not enrolled in the MA program

• Regional field offices sent initial outreach letters on September 25, 2019. A copy of the letter can be found at http://www.healthchoices.pa.gov/cs/groups/webcontent/documents/document/c_292022.pdf.

• Representatives from the regional field offices contacted agencies OMHSAS had identified as providing ABA and needing a license.

• If you did not receive an initial outreach letter or were not contacted by the regional field office, you should contact your regional field office. A list of contacts can be found on the IBHS website.
Questions or concerns about licensing

- If you cannot obtain a license by the date required or have questions about the licensing process, contact your regional field office.

- If the IBHS agency is working with OMHSAS to obtain an IBHS license, OMHSAS will not take action against the IBHS agency for not having a license.

- Regional representatives will provide technical assistance and support throughout the licensing process.

- A list of regional contacts can be found at http://www.healthchoices.pa.gov/cs/groups/webcontent/documents/document/c_291930.pdf.
IBHS Staff Qualifications
ABA Clinical Director Qualifications

Interim qualifications of a clinical director of an IBHS agency that provides ABA services (until July 1, 2022)

• Be licensed in Pennsylvania as a physician practicing psychiatry, psychologist, professional counselor, marriage and family therapist, certified registered nurse practitioner (CRNP) with a mental health certification, clinical social worker, social worker, behavior specialist or other professional with a scope of practice that includes overseeing the provision of ABA services and have one of the following:
  o A certification as a board-certified behavior analyst (BCBA) or other graduate-level certification in behavior analysis.
  o A graduate degree or graduate certificate in ABA and 1 year of full-time experience in providing ABA services.

or

• Be licensed in Pennsylvania as a psychologist as of October 19, 2019, and have 3 years of full-time experience in providing clinical oversight of an ABA program and 40 hours of training related to ABA.
ABA Clinical Director Qualifications

By July 1, 2022, a clinical director of an IBHS agency that provides ABA services must meet one of the following:

- Be licensed in Pennsylvania as a physician practicing psychiatry, psychologist, CRNP, professional counselor, marriage and family therapist, clinical social worker, behavior specialist, social worker or other professional with a scope of practice that includes overseeing the provision of ABA services and have a certification as a BCBA or other graduate-level certification in behavior analysis and 2 years of experience in providing ABA services.

  or

- Be licensed in Pennsylvania as a psychologist and have 5 years of full-time experience providing clinical oversight of an ABA program and 40 hours of training related to ABA.

  or

- Be licensed in Pennsylvania as a psychologist and have a graduate degree or graduate certificate in ABA.
ABA Clinical Director Qualifications

• An IBHS agency that provides individual services, group services, and ABA services can have the same clinical director as long as the individual who is the clinical director meets the qualifications to be a clinical director for each service provided.

• An individual who is a clinical director of an IBHS agency that offers multiple services must be able to perform all of the clinical director’s responsibilities identified in the regulations.
Behavior Analytic Services Qualifications

Individuals who provide behavior analytic services must have the following:

• A license in Pennsylvania as a psychologist, professional counselor, marriage and family therapist, clinical social worker, social worker, behavior specialist, CRNP or a professional with a scope of practice that includes overseeing the provision of ABA services.

and

• A certification as a BCBA or other graduate-level certification in behavior analysis.
Individuals who provide behavior consultation-ABA services must meet one of the following:

- Be licensed in Pennsylvania as a psychologist, professional counselor, marriage and family therapist, clinical social worker, social worker, behavior specialist, CRNP or other professional with a scope of practice that includes overseeing the provision of ABA services and have one of the following:
  - A certification as a board-certified assistant behavior analyst (BCaBA) or other undergraduate-level certification in behavior analysis.
  - One year of full-time experience providing ABA services and 12 credits in ABA.
  - One year of full-time experience providing ABA services under the supervision of a professional with a certification as a BCBA or other graduate-level certification in behavior analysis and 40 hours of training related to ABA.

- Be licensed in Pennsylvania as a psychologist and have 1 year of full-time experience providing ABA services and 40 hours of training related to ABA.
The 40 hours of training in ABA required to provide behavior consultation-ABA services can be met by the individual completing a 40-hour registered behavior technician (RBT) training program.

Staff who completed 40 hours of training in ABA as part of obtaining a behavior specialist license do not need to complete an additional 40 hours of training in ABA to provide behavior consultation-ABA service if they can document that they completed the training.
Individuals who provide assistant behavior consultation-ABA services must meet one of the following:

- Have the qualifications for licensure as a behavior specialist under 49 Pa. Code § 18.524 except the experience required under subsection (c).
  
  or

- Have a certification as a BCaBA or other undergraduate-level certification in behavior analysis and a bachelor’s degree in psychology, social work, counseling, education or a related field.
  
  or

- Have 6 months of experience in providing ABA services and a bachelor's degree in psychology, social work, counseling, education or a related field and 12 credits in ABA.
BHT-ABA Qualifications

Individuals who provide behavioral health technician-ABA (BHT-ABA) services must meet one of the following by July 1, 2020:

• Have a certification as a BCaBA.
• Have a certification as an RBT.
• Have board-certified autism technician certification (BCAT).
• Have a behavior analysis certification from an organization that is accredited by the National Commission for Certifying Agencies or the American National Standards Institute.
• Have a high school diploma and completed a 40-hour training covering the RBT Task List as evidenced by a certification that includes the name of the responsible trainer, who is certified as a BCBA or BCaBA.
• Have 2 years of experience in providing ABA services and 40 hours of training related to ABA.
• An individual can obtain a certification that he or she completed a 40-hour training covering the RBT Task List from the individual responsible for the training.

• The certification must include the name of the responsible trainer.

• The responsible trainer must be certified as a BCBA or BCaBA.

IBHS Staff Training
Behavior Analytic Services and Behavior Consultation-ABA Services

- An individual who provides behavior analytic services or behavior consultation-ABA services must complete 16 hours of training annually that is related to the individual’s specific job functions and is in accordance with the individual’s training plan.

- Individuals with BCBA certification are required to meet the IBHS training requirements. The training that is required to maintain a Behavior Analyst Certification Board (BACB) credential is consistent with the training requirements imposed by the IBHS regulations.
  - For example, a BCBA needs to take 32 hours of continuing education units (CEUs) per a 2-year recertification cycle. The IBHS regulations use annual training requirement. If an individual with a BCBA certification completes 16 hours of the 32 hours of CEUs required by the BCBA 2-year recertification cycle each year the BCBA will satisfy both the requirements needed to maintain a BCBA and the IBHS training requirements.
Assistant Behavior Consultation-ABA Services

- An individual who provides assistant behavior consultation-ABA services and does not have a certification as a BCBA, BCaBA, BCAT or other graduate or undergraduate certification in behavior analysis must complete 20 hours of training related to ABA before independently providing ABA services to a child, youth or young adult.

- An individual who provides assistant behavior consultation-ABA services must complete 20 hours of training annually that is related to the individual’s specific job functions and is in accordance with the individual’s training plan.
• If the individual has not previously provided BHT-ABA services, the individual must complete 30 hours of training prior to providing services independently that includes the following topics:
  • Child Protective Services Law and mandated reporting requirements.
  • Crisis intervention skills, including risk management, de-escalation techniques and safety planning.
  • Behavior management skills and coaching.
  • Child and adolescent development.
  • Overview of serious emotional disturbance and other behavioral and psychosocial needs of the children, youth and young adults with whom the individual works.
  • Professional ethics, conduct and confidentiality.
  • First aid, universal precautions and safety.
  • Psychotropic medications, including common side effects.
If the individual has not previously provided BHT-ABA services, the individual must complete 24 hours of training within the first 6 months of providing BHT-ABA services that includes the following topics:

- Documentation skills.
- Systems of care principles.
- Overview of functional behavioral assessment.
- Ethnic, cultural and linguistic considerations of the community served.
- Strategies and interventions to engage children, youth or young adults and parents, legal guardians or caregivers in services, including family systems theory.
- Skills and techniques for working with families.
- Overview of community resources and child and youth-serving systems and processes.
- Cross-systems collaboration.
- Communication and conflict resolution skills.
- Basic individual education plan and special education information.
- Safe use of restrictive procedures.
• Staff that currently provide BHRS and completed training in the required content areas prior to January 17, 2020 do not have to repeat training in those areas.

• An individual who provides BHT-ABA services may substitute completed college coursework for required training topics by providing an official transcript and other documentation to the IBHS agency that reflects that the coursework addressed a required training topic.
All individuals who provide BHT-ABA services must complete 20 hours of training annually related to ABA that is related to the individual’s specific job functions and is in accordance with the individual’s training plan.
IBHS Staff Training

• An individual who is certified may count hours of training required to maintain certification towards the IBHS training requirements.

• An individual who is licensed may count hours of training required to maintain licensure towards the IBHS training requirements.
IBHS Trainings

- All trainings must be approved by the Department or provided by a continuing education provider approved by the BACB.

- The Department has issued guidance regarding Department-approved trainings as well as the process to obtain Department approval. This information can be found on the IBHS website under the IBHS documents section.
Department Approved IBHS Trainings

• Trainings provided by an authorized continuing education (ACE) approved training provider are considered Department-approved trainings.
• Trainings provided by Relias are considered Department-approved trainings.
• If an organization wishes to be considered a Department-approved on-line training resource, the organization should submit an IBHS training approval form to RAPWIBHSDepTrng@pa.gov
• The IBHS agency is responsible for ensuring that the Department-approved training covers the content areas specified in the IBHS regulations.
Department Approved IBHS Training

• Trainings provided by the Department’s Office of Developmental Programs (ODP) and Office of Child Development and Early Learning (OCDEL) and the Pennsylvania Training and Technical Assistance Network (PaTTAN) are considered to be Department-approved trainings.

• Agency developed trainings that have been approved by the Bureau for Autism and Special Populations as meeting the training requirements for a behavior specialist license are considered to be Department-approved trainings.
IBHS Staff Supervision
An individual who meets the qualifications of a clinical director must provide the following supervision to individuals who provide behavior analytic services or behavior consultation-ABA services:

- One hour of individual face-to-face supervision per month that includes oversight of the following:
- If the individual who provides behavior analytic services or behavior consultation-ABA services supervises an individual who provides assistant behavior consultation-ABA services or BHT-ABA services, the individual must receive an additional hour of face-to-face supervision per month that includes a discussion of the services being provided.
- Thirty minutes of direct observation of services being provided every 6 months.
Individuals who provide assistant behavior consultation-ABA services must be supervised by one of the following:

- An individual who meets the qualifications of a clinical director.
  
  or
  
- An individual who is qualified to provide behavior analytic services or behavior consultation-ABA services.
Individuals who provide assistant behavior consultation-ABA services must receive the following supervision:

• One hour of supervision 2 times a month. The supervision must be face-to-face and include only the individual being supervised and the supervisor.

• If the individual has not previously provided assistant behavior consultation-ABA services, 3 hours of onsite supervision during the provision of ABA services to a child, youth or young adult prior to providing ABA services independently.

• Thirty minutes of direct observation of the provision of ABA services to a child, youth or young adult during the implementation of the ITP every 6 months.
Individuals who provide BHT-ABA services must be supervised by one of the following:

- An individual who meets the qualifications of a clinical director.

  or

- An individual who is qualified to provide behavior analytic services or behavior consultation-ABA services.

  or

- An individual who is qualified to provide assistant behavior consultation-ABA services and has a BCaBA or another undergraduate-level certification in behavior analysis.
Individuals who provide BHT-ABA services must receive the following supervision:

- One hour of supervision each week if the individual who provides BHT-ABA services works at least 37.5 hours per week or 1 hour of supervision 2 times a month if the individual who provides BHT-ABA services works less than 37.5 hours a week.

- An individual who provides BHT-ABA services must receive 1 hour of individual face-to-face supervision each month.

- If the individual has not previously provided BHT-ABA services, 6 hours of onsite supervision during the provision of ABA services prior to providing ABA services independently.

- One hour of direct observation of the provision of ABA services during the implementation of the ITP every 4 months, unless the individual is qualified to provide BHT-ABA services because the individual has a high school diploma and completed a 40 hour training covering the RBT Task List.

- If the individual is qualified to provide BHT-ABA services because the individual has a high school diploma and completed a 40 hour training covering the RBT Task List, the individual must receive 1 hour of direct observation of the provision of ABA services during the implementation of the ITP every 2 months.
Supervision of individuals who provide BHT-ABA services cannot occur only during the provision of services because the Department expects that there will be a need for supervision to occur outside of the presence of the child, youth or young adult. For example, a supervisor may need to discuss feedback with an individual providing BHT-ABA services which may not be appropriate to discuss in front of the child, youth, young adult or caregiver.
Supervision

• Group supervision may be provided to no more than 12 staff who provide ABA services, but only 9 of the staff can provide BHT-ABA services.

• An individual may supervise a maximum of 12 full-time equivalent staff who provide ABA services, but only 9 of the full-time equivalent staff can provide BHT-ABA services.
Supervision

• Providers of ABA services that comply with the BACB’s supervision requirements can count the supervision required by the BACB towards the supervision required by the IBHS regulations.

• Usually the amount of supervision that is required to comply with the BACB’S supervision requirements exceeds the amount of supervision required by the IBHS regulations.
Provision of ABA
Written Order

• IBHS, including ABA services, must be prescribed through a written order based on a face-to-face interaction with the child, youth or young adult. The order may be written by a licensed physician, licensed psychologist, CRNP or other licensed professional whose scope of practice includes the diagnosis and treatment of behavioral health disorders and the prescribing of behavioral health services, including IBHS.

• Written orders must specify the type of service recommended.

• Written orders should include the maximum number of each ABA service per month (i.e. behavior analytic services, behavior consultation-ABA services, assistant behavior consultation ABA-services, BHT-ABA services).
Written Order

• An order written within 12 months is required for initiation of IBHS.

• Once IBHS has been initiated, IBHS agencies that are not seeking MA payment for IBHS are not required to obtain written orders every 12 months for continued services, unless required by a commercial insurance plan.

• IBHS agencies that participate in the MA program are required to obtain written orders for continued services to receive payment.
• The Department will not be releasing a standardized format to be used for assessments.

• An assessment must include the information identified in the IBHS regulations. If a behavioral health-managed care organization (BH-MCO) or IBHS agency develops a standard format, the format must ensure that the information required by the regulations will be included in the assessment.

• A functional behavior assessment (FBA) meets the IBHS regulations’ requirement for an assessment.
An IBHS agency can provide ABA services at its office if the services are delivered in a community-like setting through group services. A community like setting is a setting that simulates a natural or normal setting for a child, youth or young adult.
IBHS requires that a child, youth or young adult have a behavioral health disorder diagnosis that is listed in the most recent edition of the Diagnostic and Statistical Manual of Mental Disorders (DSM) or International Classification of Diseases (ICD).
Question and Answer