

**Intensive Behavioral Health Services (IBHS) Statewide Webinar  
May 11, 2021**

	<b>Questions</b>	<b>Answers</b>
1.	Is there a new IBHS Website address?	Yes, the IBHS website has been migrated to the Department of Human Services (DHS) website. The new address is <a href="https://www.dhs.pa.gov/HealthChoices/HC-Providers/Pages/BHProvider-IBHS.aspx">https://www.dhs.pa.gov/HealthChoices/HC-Providers/Pages/BHProvider-IBHS.aspx</a>
2.	What clearances and mandated reporter training requirements must be completed prior to hire?	All staff clearances must be obtained prior to the staff person being hired or providing services. New IBHS staff must receive three hours of mandated reporter training within 90 days of hire and three hours of training every five years thereafter.
3.	Must a staff person submit an original of the staff person's transcript or diploma or is a copy of the transcript or diploma acceptable as proof that the staff person has the required education or credentials? Can an unofficial transcript be submitted?	Human resources staff should require prospective staff to submit official unopened transcripts. Unofficial transcripts are not acceptable. If a staff person shows human resource staff the staff person's original transcript or diploma, human resources staff should make a copy of the original transcript or diploma and initial the copy to indicate that human resource staff saw the original transcript or diploma. If a provider utilizes a university or college website to verify qualifications, human resources staff should initial a printout of the transcript and indicate that the human resources staff accessed the record through a university or college website.
4.	Would coursework completed through an approved BCBA program count towards the 40-hour requirement to be able to provide BC-ABA services? How does DHS convert coursework credit hours to training hours?	Yes, coursework completed through an approved BCBA program counts towards the 40-hour of training related to ABA required to be able to provide BC-ABA services. One coursework credit hour is equal to one training hour.
5.	What are the requirements for documenting that a staff person has completed an authorized continuing education (ACE) approved training? Is the certificate of completion sufficient?	Yes, a certificate of completion is sufficient documentation to demonstrate that an individual has completed an ACE approved training.
6.	What are the requirements for documenting that a staff person has completed an authorized continuing education (ACE) approved training? Is the certificate of completion sufficient?	Yes, a certificate of completion is sufficient documentation to demonstrate that an individual has completed an ACE approved training.
7.	If an individual completed the QBS Safety Care trainer recertification	If the training is offered by a Behavior Analyst Certification Board (BACB) Authorized Continuing

	training through QBS, but is unable to use this training to satisfy the requirements to maintain the individual's certification as a BCBA because of when the course was taken, can the training still count towards the 16 hours of ABA training needed to provide BC-ABA services?	Education (ACE) provider, it can be used to meet the annual training requirements for individuals that provide BC-ABA services.
8.	If an IBHS agency has a waiver that was approved in January 2021 and its license needs to be renewed by October 1, 2021, by when must the IBHS agency submit a waiver renewal request?	The initial waiver will be effective for less than a year and end in October at the end of the licensing period. If a waiver was approved in January 2021 and the agency license expires in October 2021, a waiver renewal request must be submitted by August 1, 2021. Requests for renewal of a waiver must be submitted by the earlier of 60 days prior to the approved waiver's expiration date or 60 days prior to the date of license renewal. Instructions on how to submit a request for a waiver can be found in OMHSAS-16-03.
9.	Are group ABA services now permitted?	IBHS agencies have always been permitted to provide Group ABA services.
10.	Are signatures required on an ITP from the youth, young adult or family if the services are being provided through telehealth because the family continues to be uncomfortable with face-to-face services?	<p>The requirement to obtain signatures on an ITP is currently suspended due to the Covid-19 pandemic.</p> <p>Although the requirement for written signatures is suspended, verbal consent must still be obtained and documented in the record prior to services being delivered. DHS continues to encourage the practice of obtaining written signatures when possible.</p> <p>A list of the temporary regulatory suspensions can be found here:  <a href="https://www.dhs.pa.gov/coronavirus/Pages/OMHSAS-Temporary-Suspension-Specified-Regulatory-Requirements.aspx">https://www.dhs.pa.gov/coronavirus/Pages/OMHSAS-Temporary-Suspension-Specified-Regulatory-Requirements.aspx</a></p>
11.	Is onsite supervision billable?	<p>We have addressed this in the IBHS Frequently Asked Questions document dated 2/8/21 located on the IBHS website. Please refer to question 15 under staff supervision which is also copied below.</p> <p><b>Question:</b> <i>Our agency provides both individual services and ABA services. Are we able to bill separately for direct observation and on-site supervision?</i></p>

		<p><b>Answer:</b> Staff who are qualified to provide behavior analytic, behavior consultation-ABA or Assistant behavior consultation -ABA (with a BCaBA) services can separately bill for direct observation and supervision of staff providing BHT-ABA services while the individual is working with a child, youth or young adult. Because ongoing supervision and direct observation are included in the rates for individual services, they may not be billed for separately. The procedure code for Skills Training &amp; Development may be used to bill for the initial on-site supervision of someone who has just begun providing the BHT service</p>
12.	<p>If a staff person provides both BHT services and BHT-ABA services, is the staff person required to obtain separate supervision for each service provided?</p>	<p>We have addressed this in the IBHS Frequently Asked Questions document dated 2/8/21 located on the IBHS website. Please refer to question 21 under staff supervision which is also copied below.</p> <p><b>Question:</b> If a staff provides multiple service types, what supervision requirements should the staff follow?</p> <p><b>Answer:</b> Staff who provide multiple types of IBHS, must receive supervision related to each IBHS they deliver. Supervision related to multiple types of IBHS can occur concurrently. For example, staff who provide both mobile therapy and behavior consultation -ABA services can receive a total of 1 hour of supervision per month which covers both services rather than receiving separate 1 hour per month supervision addressing mobile therapy services and another 1 hour per month supervision addressing behavior consultation - ABA services. If there are differing supervision requirements, staff providing multiple types of IBHS must receive the highest amount of supervision required for the IBHS the staff person provides.</p> <p>Supervision of staff providing multiple types of IBHS must be conducted by a qualified supervisor. A supervisor is qualified if they are permitted to conduct the supervision for each of the services provided by staff under the IBHS regulations. For example, an individual qualified to provide supervision of staff that provide mobile therapy or behavior consultation-ABA services can provide supervision of staff who provides both mobile</p>

		<p><i>therapy and behavior consultation -ABA services. The responses regarding the amount of supervision, as well as the qualifications of the supervisor are also applicable to direct observation requirements and supervision of staff who provide supervision to staff delivering BHT and/or BHT-ABA services.</i></p>
13.	Can an individual who is qualified to provide Assistant BC-ABA services provide supervision to individuals who provide BHT-ABA services?	Yes, an individual who is qualified to provide Assistant BC-ABA services and holds the BCaBA credential may provide supervision to individuals who provide BHT-ABA services.
14.	Are both first aid and CPR certification required?	Both first aid and CPR training are required under section 5240.73(c)(7) of the IBHS regulations. Certification demonstrates that the individual has learned acceptable techniques.
15.	What is considered "behavioral health" experience for individuals who provide BHT services?	<p>We have addressed this in the IBHS Frequently Asked Questions document dated 2/8/21 located on the IBHS website. Please refer to question 24 under staff qualifications which is also copied below.</p> <p><b>Question:</b> <i>What is considered experience in the provision of behavioral health services when an individual wants to provide BHT services? For example, can experience working in a pre-school, daycare, etc. be included?</i></p> <p><b>Answer:</b> <i>General experience working in a pre-school or daycare would not be considered behavioral health experience. Implementing a behavioral health treatment plan while a child was in a pre-school or daycare setting would be considered behavioral health experience.</i></p>
16.	The IBHS regulations require that an individual who provides mobile therapy services have a graduate degree with at least nine credits specific to clinical practice in psychology, social work or counseling? What does clinical practice mean? Can you give examples?	<p>An individual who provides mobile therapy services must have completed coursework that prepares the individual to provide mobile therapy services. This coursework must include different therapy approaches as well as instruction in mental health diagnoses. Individuals providing mobile therapy services must complete coursework that includes training in the diagnostic criteria of mental and behavioral health disorders, as well as training in conducting mental health assessments.</p> <p>Some examples of acceptable coursework include counseling, psychotherapy, family therapy, mental health counseling approaches and interventions,</p>

		child and adolescent counseling, psychopathology, diagnosis and treatment of behavior disorders, group counseling and psychotherapy, theories of counseling with children and adolescents and structural family therapy.
17.	Does the field experience required to obtain a social work degree qualify as the mental health direct service practicum required to be qualified to provide some IBHS services?	Yes, field experience in the provision of mental health services obtained as part of a social work degree may qualify as a mental health direct service practicum.
18.	Our agency provides both individual services and ABA services. Are we able to bill separately for direct observation and on-site supervision?	In fee for service, staff who are qualified to provide behavior analytic, behavior consultation-ABA or Assistant behavior consultation -ABA (with a BCaBA) services can separately bill for direct observation and supervision of staff providing BHT-ABA services while the individual is working with a child, youth or young adult. Because ongoing supervision and direct observation are included in the rates for individual services, they may not be billed for separately. The procedure code for Skills Training & Development may be used to bill for the initial on-site supervision of someone who has just begun providing the BHT service
19.	If a child is receiving services in multiple settings, do assessments need to be conducted in every setting that IBHS will be provided? What about summer camp settings?	The child should be assessed for each service that will be provided. As required by sections 5240.21(c)(7) and 5240.85(c)(6) of the IBHS regulations, the child should be assessed across the home, school, and other community settings. If a child will be receiving Summer Therapeutic Activities Program (STAP) services, an assessment should be conducted in the setting(s) where STAP will be provided. If a child is attending a camp, the graduate level professional should determine if the existing community assessment identifies the child's needs in the new environment or if an assessment in the new environment (camp) is needed.
20.	What is the skills, training and development procedure code and who can use it?	H2014 UB Skills Training & Development (Onsite Supervision) may be used by Provider Type 11, Provider Specialty 590 (Individual Services). Please refer to OMHSAS-21-03 Updates to Procedure Codes for Intensive Behavioral Health Services Agencies for additional information.
21.	Are providers required to complete an MA-97 for center-based ABA services?	In fee for service, if an ABA service requires prior authorization when delivered in the home and community, it will also require prior authorization

		when the service is provided in a licensed provider location (i.e. a center). If the ABA service does not require prior authorization when the service is provided in the home and community, it will not require prior authorization when it is provided in a center.
22.	In box 31 on the MA- 97, does “initial request” refer to this submission or if this is the initial request for services on this MA - 97? If it is a continued stay, do providers need to check this box ?	If a provider is submitting an initial request for a service, the provider should check box #31 on the MA-97. If a provider is submitting a request for continuation of a service, the provider does not need to check the box. When submitting a request for continuation of services, providers should enter the initial date of the service in box 26B on the MA-97.
23.	Prior to services being denied in fee-for-service, is the physician or provider contacted to respond to questions ?	If an OMHSAS medical reviewer requires additional information in order to make a decision about a request to prior authorize services, the medical reviewer will reach out to the contact person the provider has included in the provider’s paperwork. If the medical reviewer does not need additional information in order to make a determination that services should be denied, the medical reviewer will not reach out to the contact person included in the provider’s paperwork.
24.	If a request to prior authorize one-to-one individual services or ABA services at a center does not include the clinical rationale for why services at the center are needed, would the MCO’s request for additional information on why services at the center are clinically appropriate violate parity laws?	No. Requesting the clinical rationale for providing a service at a specific location complies with the parity laws’ requirement concerning nonquantitative treatment limitations.