



pennsylvania

DEPARTMENT OF PUBLIC WELFARE

Behavior Specialist Licensure

DPW Implementation Plan
General Stakeholder Web-Ex:
April 17, 2013



Important Notice:

Use the “chat” feature to raise questions

Phones will be muted throughout the presentation



Agenda: Today's Focus

- History Snapshot: How we got here
- Current Snapshot: BOM Update
- Application Instructions
- Status Plans
- Service Delivery Expectations
- Summary of Key Dates
- Next Steps



How We Got Here

- July 9, 2008 the Pennsylvania Insurance Law (P. L. 885, No. 62) was amended to provide coverage by MA and certain private health insurance policies of some of the costs of diagnostic assessment and treatment of autism spectrum disorders for youth under the age of 21.
- It is commonly referred to as Act 62.
- The law required the Board of Medicine (BOM), in consultation with the Department of Public Welfare (DPW), to promulgate regulations to provide for licensure of behavior specialists.



How We Got Here

- ▀ Regulations setting forth the requirements for the behavior specialist license (BSL) were promulgated with an effective date of May 26, 2012.
- ▀ DPW notified providers and stakeholders that individuals who are currently providing behavior specialist consultant services to children with autism spectrum disorders would be required to have a license by May 26, 2013 to receive payment through the Medical Assistance program.



How We Got Here

- DPW and DOS began collaborations to:
 - Ensure the least disruption to the service delivery system
 - Respond to provider and stakeholder concerns in order to implement the Behavior Specialist License (BSL)
 - Provide technical assistance
 - Refine the application process
 - Provide the 90 hours of required supplemental trainings



How We Got Here

- **3/21/13:** DPW notified providers and stakeholders that the Medical Assistance Program will continue to pay for behavior specialist consultant services provided to youth with ASD provided by staff believed to be reasonably likely to qualify for a behavior specialist license by 1/1/2014.
 - MCOs will monitor interim steps needed for full implementation
 - Individuals seeking licensure will work collaboratively with their MCO(s) to develop a status plan
 - It is the individual applicant's responsibility to update and inform the MCO(s) of status plan progress and all BOM communications



Board of Medicine Updates

- Currently processing applications within a 30-60 day timeframe (up-to-date)
- Currently reviewing information received in response to discrepancy letters within a 30-60 day timeframe
- Prioritizing the review of discrepancy information in order to complete application reviews and issue licenses

Current Status as of 4/15/13

- 908 applications received
- 157 licenses issued
- 520 applications with discrepancies



Application Review

- General Licensing Questions
- Application Process
- Review of Qualifications
- Qualification Scenarios



Other qualified licenses

- Individuals who have a psychologist, LCSW, LSW or LPC license do not have to obtain a BSL in order for MA to pay for behavior specialist services.
- Other licensed professionals who believe the work of a Behavior Specialist is within their scope of practice should contact their respective licensing board for verification.



The Application Process: Submission Considerations

- **Application Items 1-8** should be submitted together, at the same time, with the fee
- **Application Items 9-14** can be submitted separately as they become available, within 90 days of the first 8 items

NOTE: The MCOs will need to determine whether it is reasonably likely that these two steps can be met in their entirety by 1/1/2014.



Application Items 1-8

To be submitted together:

1. Pages 1 & 2 of the application, completed
2. \$75 Fee, via check or money order
3. Name change documentation, if applicable
4. Official notification of information (Self Query) from the *National Practitioner Data Bank/Healthcare Integrity and Protection Data Bank*
5. Curriculum Vitae/Resume
6. A Criminal History Record Information Report (CHRI) from the state where the applicant currently resides and/or any state where the applicant has resided within the last 10 years
7. Child Abuse History Clearance
8. FBI Criminal Background Check

Application Items 9-14 can be submitted separately as they become available (*within 90 days of the first 8 items*):

9. Verification of Master's (or higher) Degree or Post Master's Certificate – Form 2
10. Verification of Functional Behavior Assessment Experience – Form 3
11. Verification of Clinical/In-Person Experience – Form 4
12. Verification of 90 Hours of Evidence-Based Coursework – Form 5 (if applicable)
13. Verification that Master's Degree/Post Master's Certificate Awarded is in a Related Field – Form 6 (if applicable)
14. Verification of Licensure – Letter(s) of Good Standing



The Application Process: Submission Considerations

- Applicants who have not yet submitted an application should use the revised application form and should submit that application as soon as possible.
- If you have already submitted an application, **do not submit another one.**
- If you are notified about a discrepancy, you should use the new forms when you submit any items that address a discrepancy. The Board of Medicine will accept any combination of the application and required forms.

The most up-to-date application is currently dated **March 1, 2013**.
An updated version is under development and will be dated **April 2013**.



THE APPLICATION PROCESS

An application **SHOULD NOT** be submitted until the individual has obtained a Master's or Post-Master's certificate in an approved field or a related field **AND** has the required Functional Behavior Assessment and clinical experience.



Education



EDUCATION

- **Master's Degree or Post-Master's Certificate is in a named field**
The qualifications for licensure include completion of a master's degree or higher degree, including a post-master's certificate in Behavioral Analysis; Special Education; Speech Therapy; Psychology (School, Clinical, Counseling or Developmental); Professional Counseling; Social Work; Occupational Therapy; Nursing; or a related field.
- **Master's Degree or Post-Master's Certificate is in a field related to a named field**

Consideration: An individual may need to provide verification of enrollment in a post-master's certificate program if it is not reasonably likely that their existing credentials will meet the criteria.



THREE POSSIBLE WAYS TO SATISFY THE EDUCATION REQUIREMENT:

1. Master's Degree or Post-Master's Certificate is in a named field

Behavioral Analysis; Special Education; Speech Therapy; Psychology (School, Clinical, Counseling or Developmental); Professional Counseling; Social Work; Occupational Therapy; Nursing; or a related field.

- **The applicant completes Section 1 of Forms 2 and 5 of the application and sends them to the University, along with a request for an official transcript.**
- **University determines that either:**
 - all 90 hours/eight content areas were fulfilled through the major course of study
 - some, but not all, of the 90 hours/eight content areas were fulfilled through the major course of study
 - none of the 90 hours/eight content areas were fulfilled through the major course of study
- **The applicant then fulfills the remaining content hours through supplemental coursework, if necessary.**



2. Master's Degree or Post-Master's Certificate is NOT in a named field, but a related field

- Applicant completes Section 1 of Forms 2, 5 and 6 and sends them to the University, along with a request for an official transcript.
- If the University verifies the Major/Degree is in a related field, the applicant fulfills any of the 90 content hours that were not completed within that program through supplemental coursework.



3. Master's Degree or Post-Master's Certificate is NOT in a named field or a related field

- **If the University cannot verify the Major/Degree is in a named or related field, DO NOT SUBMIT AN APPLICATION.**
- If a university cannot verify that the individual's Master's degree or Post-Master's Certificate is in a related field, the individual is not eligible for licensure until the individual obtains a Master's or Post-Master's in a named or related field.
- Notify your MCO if you are in this situation, and plan to enroll in a post-graduate certificate program.



Evidence-Based Coursework



90 HOURS OF EVIDENCE-BASED COURSEWORK, 8 CONTENT AREAS

- Professional Ethics (*3 hours*)
- Assessment Coursework Or Training (*16 hours*)
- Crisis Intervention (*8 hours*)
- Family Collaboration (*5 hours*)
- Autism-specific Coursework/Training (*18 hours*)
- Instructional Strategies & Best Practices (*16 hours*)
- Co-morbidity & Medications (*8 hours*)
- Addressing Specific Skill Deficits Training (*16 hours*)



VERIFICATION OF 90 HOURS OF EVIDENCE-BASED COURSEWORK

Every application must include verification that ALL 90 hours of evidence-based coursework have been completed.

These hours can be completed through:

- Accredited college/university coursework (undergraduate or graduate)
- BAS-approved supplemental trainings
- BACB Continuing Education
- OR a combination of these options



College/University determines that all 90 hours were fulfilled through the major course of study

- The official College/University agent will sign off on the appropriate forms and send those forms and an official transcript to the Board of Medicine.
- In this case, there is no need for the applicant to take supplemental coursework or trainings.

*See Application Flowchart Number One for Additional Detail



College/University determines that the degree/post-graduate certificate is in a named or related field, but none or only some of the 90 hours/eight content areas were fulfilled through the major course of study

- The applicant must fulfill the remaining content hours through supplemental coursework:
 - through an accredited college/university (undergraduate work acceptable)
 - through BAS-approved trainings or BACB continuing education
 - a combination of these options

*See Application Flowchart Number Two for Additional Detail



Supplemental Training



VERIFICATION OF SUPPLEMENTAL TRAININGS

Form 5 verifying supplemental training documentation should NOT be submitted unless you can verify that the **training has been pre-approved by the Bureau of Autism Services or for BCBA Continuing Education**, and you can provide the supporting documentation.

All 90 hours of required training, fulfilling the 8 content areas, are available through BAS-approved virtual trainings.

Only BCBAs should submit BACB continuing education documentation.

A revised Form 5 will be available within the next two weeks. Use this version when submitting a new application, or responding to supplemental training discrepancies.



DOCUMENTING BAS SUPPLEMENTAL TRAININGS

• **BAS Virtual Trainings**

Once you have completed a virtual training on the BAS Virtual Training Center (VTC), <http://bastraining.tiu11.org> you will receive a certificate listing the Course Name, Course Number, and the number of hours awarded for each content area.

• **BAS Face-to-Face Trainings (FBA/Advanced FBA, PATC)**

If the certificate you have does not already include the BAS Course #, Content Area, and Hours Awarded, then email ra-bastrainings@pa.gov with the following information:

- Date/year of the FBA training or BAS conference
- FBA: Name of the FBA trainer and the location
- PATC: list of the keynote/breakout sessions you attended
- If you provide attendance documentation received, it will expedite the process
- ***Current Timeframe: Approximately 2 weeks to process a request***



DOCUMENTING BAS-APPROVED TRAININGS PROVIDED BY OTHER ORGANIZATIONS

Form 5 verifying supplemental training documentation should NOT be submitted unless you can verify that the **training has been pre-approved by the BCBA or the Bureau of Autism Services**, and can provide the supporting documentation.

- Authorized documentation for any BAS-approved training will include a BAS Course Number, and the number of hours awarded in each content area.
- Applicants are still submitting non-approved trainings with their applications, which is creating discrepancies and unnecessary delays.
- THE BOARD OF MEDICINE DOES NOT EVALUATE COURSEWORK OR TRAININGS. ONLY SUBMIT SUPPORTING DOCUMENTATION THAT COMPLIES WITH THE APPLICATION PROCEDURES.



BAS-APPROVED EXTERNAL TRAININGS

- BAS has evaluated and approved approximately 275 external trainings to date, with an additional 100 trainings currently in the process.
- Check with your training provider to determine if a training you have taken has been approved. Only they can provide the documentation needed for attendance/BSL verification.
- BAS will continue to evaluate external trainings.



EXPERIENCE

- **FBA Experience**

- At least 1 year of experience involving functional behavior assessments of individuals under 21 years of age
- Includes the development and implementation of behavioral supports or treatment plans
- Experience implementing an FBA as a Therapeutic Staff Support worker can satisfy the requirement
- Being a teacher in an autistic support class, job coach, residential program manager or direct work experience provided in a STAP are other potential ways to meet experience requirements
- Experience can also be obtained providing services outside of BHRS
- Needs to be face-to-face
- Verification of experience does not need to be documented by the direct supervisor but must be verified by the agency



EXPERIENCE

- **Clinical Experience**

- 1,000 hours of in-person clinical experience with individuals with behavioral challenges OR 1,000 hours of experience in a related field with individuals with autism spectrum disorders
- Can be experience working with children or adults
- Experience can be subsequent to obtaining the bachelor's degree or during master's program
- Verification of experience does not need to be documented by the direct supervisor but must be verified by the agency



KEEP THE MCOs UPDATED AFTER SUBMITTING AN APPLICATION

- After submitting an application to BOM, provide the MCO with all documentation and correspondence received from the BOM. This documentation is necessary in order for the MCO to continue paying you for BSC services
- Documentation that you may receive includes, but is not limited to:
 - letter of receipt (which includes an individual identifier to track status online)
 - discrepancy letters
 - copy of the license once it is issued (by mail)
- MCOs will use this information to update your status plan, monitor progress and make decisions regarding the continuation of payment.



Status Plan Expectations

- In order to adequately assess individual qualifications and ensure network capacity for service provisions, the MCOs must obtain status plans for each unlicensed staff who wishes to continue to be paid to provide BSC services to youth with ASD
- Information requested by the MCO will be used to determine whether it is reasonably likely the applicant will meet the qualifications for a behavior specialist license by 1/1/14.
 - If the MCO determines that it is reasonably likely the applicant will meet the qualifications for a behavior specialist license, the MCO should continue to pay for behavioral specialist consultant services provided by the applicant.
 - If the MCO determines that it is not reasonably likely the applicant will meet the qualifications for a behavior specialist license, the MCO should develop a transition plan.



Status Plan Expectations

Status Plans should:

- Reflect the most expedited timeframe possible
- Clearly indicate that the process outlined in the application is being followed
- The applicant will supply the requested information to the MCO, who will review the information in order to determine if it is reasonably likely that the staff person will meet the qualifications for a behavior specialist license by 1/1/14.
- Applicants will follow all procedures developed to create and update status plans that are developed which are beyond what is addressed in this presentation.



Status Plan Components

- At minimum each individual's status plan must include:
 - the staff person's qualifications:
 - Education
 - Training
 - Experience
 - Ability to submit a complete application within the prescribed timeframes
 - the specific requirements the staff person still needs to fulfill to obtain a behavior specialist license, *i.e. three more months to acquire one year of clinical experience; or a certain number of supplemental training hours*
 - a detailed description of how the staff person will meet the remaining qualifications for a behavior specialist license in the timeliest way possible, but no later than 1/1/14



Additional Information

- MCOs will use an individual's status plan to make payment determinations. These determinations are specific to receiving MCO payment and are independent of any licensing decision the BOM may make.
- Because each MCO will be making their own payment determinations applicants should be prepared to submit varying information to each MCO. MCOs may require information beyond the key components listed in the previous slide.
- The MCOs received training on the implementation plan on 4/12/13. They will be distributing information to their provider networks regarding their specific requirements and timelines in the very near future. Please allow them time to distribute this information.



Qualification Scenarios



Implementation Process Scenarios

Scenario 1: Individual has submitted all components of the application prior to 5/26/13 and is awaiting a determination of licensure

Scenario 2: Individual is not able to meet the qualifications by 5/26/13 but is reasonably likely to meet them by 1/1/14

Scenario 3: Individual is not able to meet the qualifications by 5/26/13 and is not reasonably likely to meet them by 1/1/14



Implementation Process: Scenario 1

Individual has submitted application prior to 5/26/13 and is awaiting a decision

- Individuals should provide their MCO with verification that the BOM has received the application and payment
- Applicants can use the unique identifier contained in letter of receipt to check their application status **ONLINE**
- Applicants should supply the MCO with any information they have received from the BOM, **regarding their application**
- MCOs may request a copy of the application directly from the individual or use some other means to determine if payment for services should continue
- **It is the applicant's responsibility to provide the appropriate information to the MCO because MCOs are not able to contact BOM directly and check on the status of an individual's application.**



Implementation Process: Scenario 2

Individual is not able to meet the qualifications by 5/26/13 but is reasonably likely to meet them by 1/1/14

- The individual develops a status plan as directed by their MCO(s)
- MCO reviews information and makes a payment determination
- The applicant continues to meet expectations as outlined in their status plan, in agreement with their MCO
- The MCO will continue to monitor and reassess the status plan information to determine whether it is reasonably likely that the applicant will meet the qualifications for a behavior specialist license

* Individuals hired after 5/26/13 may fall into this scenario



Implementation Process, Scenario 3

Individual is not able to meet the qualifications by 5/26/13 and is not reasonably likely to meet them by 1/1/14

- The individual and provider should work with the MCO on creating a transition plan as quickly as possible
- Transition plans would not be expected to extend past 60 days
- If there is a need for a transition plan extending past 60 days, the Children's Bureau should be made aware of the circumstances
- Appropriate and accurate information regarding the transition process must be conveyed to family members



Additional Expectations

- ▼ Transition planning should occur in all cases where there will be a staff change.
- ▼ The Department does not expect there to be a disruption in service during the transition time of 5/26/13-5/26/14 due to the flexibility afforded to the MCOs.
- ▼ In addition, the Department does not expect there to be a disruption in service after 5/26/14 given that the MCOs have over a year to plan for any transitions that may be needed.



May 26, 2014

The date by which all staff who provide BSC services to youth with ASD must be licensed by in order to receive MA payment



Service Delivery Expectations

- Act 62 established qualification standards for staff providing behavior specialist services to youth with autism.
- The Department does not expect providers to prescribe other services in order to avoid having services provided by staff with appropriate qualifications.
- The Department does expect the Health Choice Contractors to monitor for events such as the below, and include provisions in their review and authorization processes to assess for such occurrences.
- *Example: a child with autism has been receiving BSC services for over a year and the latest request no longer includes BSC service but rather requests the same amount of hours for the MT service. Why did the request change? Did it have anything to do with the qualifications of the individual who provided the BSC services?*



Summary of Key Dates:

MCO report dates:

- **MAY 1, 2013: Current Landscape Submission to DPW**
Written progress update on eligible staff applications that will be submitted by 5/26/2013
- **May 31, 2013: Monitoring Plan Submission to DPW**
Written Monitoring Plan for existing staff and potential new hires
- Update status plans on a monthly basis

Implementation Plan dates:

- **5/26/13:** Initial Deadline for BS Licensure
- **1/1/14:** Extended Deadline to meet the qualifications and submit an application
- **5/26/14:** All staff must be licensed in order to receive MA payment



Next Steps

- **Ongoing Technical Assistance**
- **Applicant Submission of Status Plan Documentation to MCOs Upon Request**
- **MCO Monitoring of Implementation Compliance**
- **Transition Plans are Developed as Necessary**

The Power Point will be available on our website in the near future at the following link:

http://www.parecovery.org/services_bhrs.shtml



Questions??