



ISSUE DATE

January 22, 2021

EFFECTIVE DATE:

January 17, 2021

NUMBER:

OMHSAS-21-02

SUBJECT:

**Provision of One-to-One Intensive
Behavioral Health Services in a Licensed
Location**

BY:

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Office of Mental Health and Substance Abuse Services

SCOPE:

This bulletin applies to Intensive Behavioral Health Services (IBHS) agencies that are enrolled in the Medical Assistance (MA) Program and want to provide one-to-one individual services or applied behavior analysis (ABA) services in a licensed IBHS location to MA beneficiaries.

PURPOSE:

The purpose of this bulletin is to clarify the provision of one-to-one individual services or ABA services in a licensed IBHS location.

BACKGROUND:

On October 19, 2019, the Department of Human Services (Department) promulgated 55 Pa Code Chapters 1155 and 5240, which codified the minimum standards for licensing and MA payment conditions for agencies that deliver IBHS to children, youth and young adults under 21 years of age with mental, emotional and behavioral health needs. The regulations replaced the requirements for Behavioral Health Rehabilitation Services (BHRS) previously set forth in bulletins issued by the Department. IBHS includes individual services, ABA services, group services, and evidence-based therapy delivered through individual services, ABA services or group services.

The IBHS regulations specify that IBHS may be delivered in home or community-based, clinically appropriate settings as identified in the written order and individual treatment plan and that group services may also be delivered in a community like setting. 55 Pa. Code § 5240.23(c).

DISCUSSION:

IBHS is used to support the behavioral health needs of children, youth and young adults in the natural environments where they live, learn and play. The environment where individual services, ABA services, or group services is delivered should be the least restrictive environment where a child, youth or young adult can reasonably be expected to achieve success.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:
Office of Mental Health and Substance Abuse Services, Bureau of Children's Behavioral Health
Services, P.O. Box 2675, Harrisburg, PA 17105 E-Mail: RA-PWIBHS@pa.gov

While the IBHS regulations address the provision of group services in a community like setting, they do not address whether individual services or ABA services provided by a clinician to one child, youth or young adult, can be provided at a licensed IBHS agency's location if services in that location will be clinically appropriate and meet the unique needs of the child, youth or young adult. These services are referred to as one-to-one individual services or ABA services.

In some instances, the provision of one-to-one individual services or ABA services in a child's, youth's, or young adult's natural environment may not meet the child's, youth's or young adult's behavioral health needs. In such instances it may be clinically appropriate to provide medically necessary individual services or ABA services at a provider's licensed location. Because these are services that are being provided to children, youth or young adults, the areas in the provider location where services are being provided should be age and developmentally appropriate and community like. A community like setting is a setting that simulates a natural and normal setting for a child, youth or young adult. Services provided at a provider's location are sometimes referred to as center-based services.

One-to-one individual services and ABA services at a center may be provided for the amount of time required to enable the child, youth, or young adult to acquire skills that will allow the child, youth, or young adult to transition to services in the home or community or for a longer period of time if receiving services at a center is clinically appropriate for a child, youth or young adult.

PROCEDURE:

Providers who want to provide one-to-one individual services or ABA services at a center must address these services in their service descriptions. A provider that is already licensed should submit an addendum to its service description that includes the information identified in Attachment A. The addendum should be submitted within 45 days of the issuance of this bulletin to the provider's Office of Mental Health and Substance Abuse Services (OMHSAS) licensing representative. Providers that have already obtained an IBHS license may continue to provide one-to-one individual services or ABA services unless they are informed by OMHSAS that the addendum to their service description has not been approved.

Providers that have not already obtained an IBHS license and intend to provide one-to-one individual services or ABA services at a center should include the information identified in Attachment A in their initial service description.

ATTACHMENTS:

Attachment A: Additional Information for Service Descriptions for IBHS Agencies That Intend to Provide One-to-One Services in a Center