

Intensive Behavioral Health Services – Staffing and Parent/Guardian Communication

This bulletin is to advise all Intensive Behavioral Health Services (IBHS) providers, both Regionalized and Applied Behavioral Analysis (ABA), of a new requirement. CBH recognizes that staffing challenges persist in our city and that many children approved for IBHS are not receiving services as authorized.

Effective June 15, 2025, CBH will require every IBHS provider to develop and disseminate a policy on parent/guardian communication during periods when approved services are not staffed as authorized. Specifically, the policy should detail who, when, and how the agency will communicate with the youth/parents/guardians for any period of services not being delivered, as authorized. Details about how the lack of staffing will impact the previously agreed-upon Individual Treatment Plan (ITP) and whether the ITP needs to be amended or updated should also be discussed. For extended periods of any service being unstaffed beyond 30 days, the policy must include periodic updates to the youth/parents/guardians at least once every 30 days.

If children and youth are approved to receive services in schools, the communication plan should also include who, when and how the agency will communicate the plan to the school partners. The plan must include how the IBHS provider will support the child/youth while services are not being delivered. Once again, a discussion of whether the lack of staffing will impact the ITP goals or interventions should also occur.

If children and youth are without ALL authorized IBHS Services, the communication plan must include alternate available services (such as referral to Case Management or Outpatient therapy) and contact information for an IBHS Supervisor, along with an updated Safety Plan during the absence of staffed IBHS. Providers should also address when they would hold an Interagency Services Planning Team (ISPT) meeting with family and system partners.

CBH Clinical Staff will continue to enter Quality of Care concerns whenever a provider's lack of staffing negatively impacts a child's wellness, continues for an extended period of time, or the child requires a higher level of care following a period of staffing vacancy.

If you have questions about this bulletin, please contact the IBHS Clinical Coordinator for Regionalized providers at Kawana.Childs@phila.gov or the IBHS Clinical Coordinator for Neurodevelopmental Services (IBHS-ABA) at Jessica.Woods@phila.gov.