

CHILDREN'S HABILITATION INTERVENTION SERVICES

Public Comment Summary and Department Responses

Public Comment Period: July 3, 2019 through July 24, 2019

Negotiated Rulemaking and public meeting was held to solicit feedback with respect to:
 · Draft Rule 16.03.09 – Children’s Habilitation Intervention Services – Docket No. 16-0309-1803

Comments		Responses	
W-Written V-Verbal	Operational Concerns		Policy Change
W	Comment to remove IDAPA 16.03.09.574.01.a.iv, the requirement of implementation plans to be included in the initial prior authorization request.	Thank you for the response. This information will be shared with Administration for consideration when determining the requirement of implementation plans to be included in the initial prior authorization request.	TBD – No determination has been made as of this date, but this feedback is being considered.
W	Comment specific to clarifying IDAPA 16.03.09.574.02.m. for restrictive or aversive interventions.	Thank you for your response. The Department will take into consideration when updating rule.	TBD – No determination has been made as of this date, but this feedback is being considered.
W	Comment specific to clarifying IDAPA 16.03.09.573.05.b.ii.	Thank you for your response. The Department will take into consideration when updating rule.	TBD – No determination has been made as of this date, but this feedback is being considered.
W/V	Comments specific to the Prior Authorization timeframe of 4 months. Providers and families are asking for a 6-month review as there is no	Thank you for the response. This information will be shared with Administration for consideration when determining the prior authorization timeframe.	TBD – No determination has been made as of this

	research to support 4 months and the industry standard is 6 months.		date, but this feedback is being considered.
W/V	Comment specific to the Assessment and Clinical Treatment Plan requiring the requested number of hours per week instead of monthly.	Thank you for the response. This information will be shared with Administration for consideration.	TBD – No determination has been made as of this date, but this feedback is being considered.
W-Written V-Verbal	Access Concerns		Policy Change
W	Comments specifically addressing insufficient number of Evidence-Based Model providers in Idaho.	Thank you for your response. The Department understands the shortage of Evidence-Based Model providers in Idaho. With the addition of Evidence-Based Model providers and the Independent providers, at both a bachelor level and masters level, the Department anticipates an increase in available providers to provide Children’s Habilitation Intervention Services.	N/A
W-Written V-Verbal	Training and Supervision Concerns		Policy Change
W	Comment specific to training and supervision requirements for comprehensive assessments and implementation plans - IDAPA16.03.09.575.03.	Thank you for your response. This information will be shared with Administration for consideration when determining the appropriate training and supervision for individuals completing comprehensive assessments and implementation plans.	TBD – No determination has been made as of this date, but this feedback is being considered.
W	Comment specific to removing IDAPA 16.03.09.575.09.e.	Thank you for your response. The Department will take into consideration when updating rule.	Yes - The Department has reviewed this rule requirement and recommends removing 16.03.09.575.09.e in its entirety

W	Comment specific to IDAPA 16.03.09.574.04 and the Board requirements for supervision.	Thank you for your response. The credentialing Board establishes and oversees the supervision requirements for providers within their model. The Department is unable to dictate the Board requirements. The Department did, however, increase rates for such providers to include a component of supervision costs to agencies and independent providers with an Evidence-Based Model credential.	N/A
W-Written V-Verbal	Other Related Concerns		Policy Change
W	Comment specific to IDAPA 16.03.09.571.07.a stating that duplication may be left up to agency/provider interpretation.	Thank you for your response. This information will be shared with Administration for consideration when determining updates to make rule clearer.	Yes – The Department is considering this feedback and will update language to be clearer.
W	Comments specific Medicaid Handbook references in rule.	Thank you for your response. The Department will take this into consideration when referring to the Medicaid Handbook in rule.	TBD – No determination has been made as of this date, but this feedback is being considered.
W	Comment requesting to remove the definition of community.	Thank you for your response. The Department will take into consideration when updating rule.	Yes – The Department is considering this feedback and will update language to be clearer.
W	Comment specific to reviewing all rules in this docket for valid intent.	Thank you for your response. The Department has deleted multiple sections from rule and condensed sections to remove duplication. The Department will take this into consideration as we continue to seek ways to remove additional requirements.	TBD – No determination has been made as of this date, but this

			feedback is being considered.
W	Comment specific to IDAPA 16.03.10.526.02.a and 16.03.10.526.02.b stating they are duplicative.	Thank you for your response. The Department will update rules appropriately to remove the duplication.	Yes - The Department has reviewed these rules and will remove the duplicate.
W	Comment to review rules with valid intent and efforts to conform to Executive Order No. 2019-02.	Thank you for your response. The Department will take this into consideration reducing the number of rule requirements and duplications.	TBD – No determination has been made as of this date, but this feedback is being considered.