

Guide to Professional Behavior Services

Feedback and Responses

On page 10, the guide indicates that every challenging behavior exhibited by the individual must be added to the known risk page of the ISP. However, some challenging behaviors are not risks. For example, yelling can be a challenging behavior, but it may not be an identified risk by the RIT. But of course, a known behavioral risk should be addressed with a support document, most often, the PBSS.

ODDS Response: Thank you. You are correct. Updated this section to indicate it should only list behaviors that constitute a risk. Whether something is a risk or high risk depends on team identification using the ONA Risk Report or the RIT. Removed the section about high risk and the risk assessment matrix, too.

OR310 (page 11) hours can also be used to update the FBA. This is in the proposed rules and needs to be clear as there has been lots of confusion about this.

ODDS Response: Thank you. This correction was made.

The information in the guide around invoicing (page 15) does not match the proposed rules (411-304-0190 (1) a-f). The proposed rules do not say specifically that these items are required to be in an invoice so maybe that is not the intent of the rule. However, this is going to cause confusion as one CME will look at the rule for guidance and another will use the guide as rule 😊.

ODDS Response: Clarification was added: replaced “must” with “should” and indicated that invoices are submitted upon request. Removed outdated reference to Invoicing Worker Guide.

Releasing payment (page 15) only applies to OR570 events now so that should be clear in the guide. I also think it is only fair to define ‘timely manner’. During the pilot with the kids unbundling, we sometimes waited several months and had to contact several people to get paid.

ODDS Response: Added “typically within 10 business days when no corrections are needed”.

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Timelines (page 16-17) The last sentence was meant to be a grandfather clause when the rules had a significant update. Basically, if the PBSP was updated, it had to meet current rules. As this sentence is currently written is confusing for people who don't know the history behind this guide.

ODDS Response: Removed last sentence.

Exceptions (page 16) In my opinion this should just point to the rule. 411-304-0140 (3d)

ODDS Response: Removed this section, exceptions are referenced elsewhere.

Limitations and exclusions (page 17) In my opinion this should just point to the rule. 411-304-0140 (3)

ODDS Response: Removed this section, as it is redundant to rule as pointed out.

FBA and PBSP timelines: The guide say an FBA generally takes 90 days and the PBSP generally takes 45 days.... then why is a TESP only good for 90 days? This is nitpicky but it doesn't make sense to me.

ODDS Response: The references to 90 days for FBA and 45 days for PBSP are general guidelines. TESP's can be extended another 90 days when needed, per current and July 1 rule.

Prohibited Interventions: In my opinion, this should just be a reference to the rule.

ODDS Response: This section was removed as it is redundant to rule.

Weight test (page 25 and 43): This is not in the rule. Its good practice but not rule required to be documented in the PBSP or TESP. 411-304-0160 (1b) indicates that the behavior professional must consider this, but it does not say it has to be written in the PBSP.

ODDS Response: Changed to match rule: "Documentation that the Behavior Professional has weighed the risk of harm to the individual from each challenging behavior against the potential risk of harm from each Safeguarding Intervention."

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Chapter 9 Maintenance: This should indicate that FBAs are also part of maintenance.

ODDS Response: Added a bullet point to this effect.

Just an editing issue (Appendix F) Be consistent, either the acronym goes first or the words. ISP – ISP (missing the actual words 😊)

ODDS Response: Thank you!

Please add page numbers. This makes it much easier when I refer people to the guide for an answer.

ODDS Response: Thank you! This change was made.

"Finding a behavior professional." Please add in the process to get on the database and or attach the form for updating the database.

ODDS Response: Thank you. Updated and included information on looking in eXPRS as an alternative.

Under "Chosen services" it states "The authorized dates should be in accordance with ISP team agreement but cannot exceed the plan year." You clarify this later in the guide, that this can be started in one plan year, ended, and restarted. In my experience this happens often.

ODDS Response: Added a statement to this effect in the "Chosen Services" section.

Under "collaboration with the Behavior Professional" and "Rates" the guide states "hours" which I think would be better stated "increments" as other parts of the guide refer to quarter hours

ODDS Response: This was updated to state hours/units/events.

Under "Standard Rate and Rural County Rate" language does not match the expenditure guidelines: The rate of \$108.20/hour should be used when the consultant must travel beyond 70 miles one way, and they are the most cost-effective provider available. This rate includes all travel expenses.

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ODDS Response: You are correct. ODDS will move to tie the modifiers to distance rather than county. This has been changed in the Guide.

"Limitations and exclusions" the final one that states "include money or resource management" my guess is you are stating I should not be billing maintenance to approve a trip to the coast that is financial plan authorization. However, we do often provide direct feedback and FAB's for people who have challenging behaviors that are about their money and or resources.

ODDS Response: Removed this section per other feedback. It is already in rule.

Under "Maintenance Timelines" the guide switches to using "invoice" when the rule language states, "Progress note." This is important because a lot of independent providers submit case notes and not invoices.

ODDS Response: Clarified this section and removed sample maintenance invoice.

Under the "Sample Maintenance Invoice" it states again that this is an invoice, rather than "progress notes."

ODDS Response: See above.