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TO: Approved Providers of Medicaid HCBS Waiver-funded Behavior Support Services
Executive Directors-DSN Boards
CEOs-Contracted Service Providers

FROM: Susan Kreh Beck, Associate State Director – Policy 

DATE: September 16, 2014

RE: BCBA Requirement Update

As was announced previously, certification by the Behavior Analyst Certification Board as a Board Certified Behavior Analyst (BCBA) or as a Board Certified Assistant Behavior Analyst (BCaBA) will be required for providers of Home and Community Based Services (HCBS) Waiver-funded Behavior Support Services in South Carolina effective July 1, 2015. In order to maintain the current level of provider availability when this new requirement takes effect, DDSN has recommended, and DHHS has agreed to, the allowance of a grace period for those providers who were approved prior to July 1, 2015 and who have embarked upon their pursuit of either the BCBA or the BCaBA credential.

Behavior Support Services providers enrolled as of June 30, 2015 who do not hold BCBA or BCaBA certification, but who are in good standing (with regard to quality assurance reviews), will be allowed to remain as providers of Behavior Support Services if they are actively engaged in pursuit of either the BCBA or the BCaBA certification. These providers will be allowed to continue to provide services without one of these credentials through June 30, 2018 as long as they remain in good standing and in continuous (i.e., uninterrupted except by semester breaks), active pursuit of certification.

The included attachment contains details of the acceptable documentation for proof of continuous active pursuit of the certification. This will need to be provided to DDSN by June 1st and December 1st of each year subsequent to the initial request to continue as a Behavior Support provider for individuals. If pursuit of certification is not established prior to July 1,

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2015 and is not continuously maintained and reported according to the schedule described above, DDSN will recommend to DHHS that the Behavior Support provider's enrollment status be terminated.

This allowance will benefit DDSN consumers by maintaining the current supply of providers of Behavior Support and increase the competencies of these providers. Increased professional competence will assure quality data collection, improve behavior analysis, treatment planning and staff training utilizing positive behavior supports. Please direct any questions regarding the certification requirement to Jacob Chorey at jchorey@ddsn.sc.gov.

cc: Dr. Beverly Buscemi, State Director
Mr. Tom Waring, Associate State Director-Administration
Mr. David Goodell, Associate State Director-Operations
Mr. John King, Director-District I
Mr. Rufus Britt, Director-District II
Mrs. Janet Priest, Director-ID/RD Division
Mr. Jacob Chorey, Director-Employment and Day Services
Mr. Mark Morgan, Crisis Prevention Coordinator
Dr. Kathi Lacy, Senior Consultant, Policy Division
Dr. David Rotholz, Executive Director, Center for Disability Resources-USC
Dr. Christian Martin, Professor- Exceptional Children Department-USC
Dr. Pete Liggett, Deputy Director for Long Term and Behavioral Health, DHHS
Mr. Rick Hepfer, Deputy General Counsel, DHHS

Attachment

Behavior Support Provider Certification Requirement Allowance

Acceptable Documentation of Continuous Pursuit of Certification

In order to demonstrate continuous pursuit of certification, **initially and twice per year** (by June 1st and December 1st of each year), DDSN Behavior Support providers without the BCBA or BCaBA certification must provide documentation in order to satisfy the following requirements:

- **Initially** and prior to July 1, 2015, Behavior Support providers must submit a copy of course registration documents for the course in which you are enrolled.
 - If not in session (e.g., during summer break), then a copy of a transcript showing a passing grade for one or more of the required courses (during the most recently completed semester) will be acceptable.
 - If you have not yet begun the coursework, you must submit documentation of acceptance to a university/college that offers a course sequence approved by the BACB. Evidence of the BACB's approval of the course sequence being offered must be attached.
 - Each submission must be accompanied by a statement of the projected date of certification no later than July 1, 2018.
 - Documentation should be submitted to Mr. Jacob Chorey through US mail (P.O. Box 4706, Columbia, SC 29240) or scanned through email to jchorey@ddsn.sc.gov. Receipt of documentation will be acknowledged via email.
- **Twice per year**, by December 1st and June 1st each year until certification, Behavior Support providers must submit the appropriate evidence according to your progress, as defined below.
 - Until the requisite coursework has been completed, submit a copy of course registration documents for the course in which you are enrolled. If not in session (e.g., during summer or holiday season), then a copy of a transcript showing a passing grade for one or more of the required courses (during the most recently completed semester) will be acceptable.
 - After the requisite coursework has been completed and until the required supervision hours have been completed, submit written verification of an active agreement for supervision by a BCBA and a statement of the number of supervision hours completed to date.
 - After the required supervision has been completed, submit evidence of application to take the BCBA or BCaBA Exam.
 - Each submission must be accompanied by a statement of the projected date of certification, which may be no later than July 1, 2018.
 - Documentation should be submitted to Mr. Jacob Chorey through US mail (P.O. Box 4706, Columbia, SC 29240) or scanned through email to jchorey@ddsn.sc.gov. Receipt of documentation will be acknowledged via email.

If continuous pursuit of certification is not maintained and reported according to the schedule described above, DDSN will recommend to DHHS that the waiver provider's enrollment status be terminated due to failure to comply with certification requirements.

If pursuit of certification is not established prior to July 1, 2015, DDSN will recommend to DHHS that the waiver provider's enrollment status be terminated due to failure to comply with certification requirements.