

From: [Noble, Bianka](#)
To: [HFS.BPPC](#)
Subject: [External]
Date: Tuesday, September 30, 2025 1:05:44 PM
Attachments: [image342899.png](#)
[image293083.png](#)

Hi

Is the notice PROPOSED CHANGES IN METHODS AND STANDARDS FOR ESTABLISHING MEDICAL ASSISTANCE PAYMENT RATES from Date: September 30, 2025 related to LSW, and is this notice affecting FQHC?

Thank you

Bianka J Noble



Bianka Noble *SHE/HER/HERS*

Senior Manager of Revenue Cycle

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Email: Bianka.Noble@primecarechi.org

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From: [Sol Milworm](#)
To: [HFS.BPPC](#)
Subject: [External] ABS notice
Date: Tuesday, September 30, 2025 1:00:45 PM
Attachments: [image001.png](#)

Hi there, can you please provide detail on the notice?

1. What changes?
2. Is this proposed or going in effect?

Thanks,

Sol Milworm
2801 W Howard St
Chicago. IL 60645
P. 844-744-4800
F. 773-321-3020
www.brightercareaba.com



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From: [Blair Monfre](#)
To: [HFS.BPPC](#)
Subject: [External] Comments on SPA for ABS
Date: Monday, October 20, 2025 11:19:26 AM
Attachments: [Outlook-elprigx4.png](#)
[Outlook-qxjx2uk0.png](#)
[Outlook-ng3lsjb.png](#)
[Outlook-5w3uvney.png](#)
[TS Comments on SPA.pdf](#)

Hello,

Please find the attached Public Comments on State Plan Amendment (SPA) for Adaptive Behavior Support (ABS).

Blair Monfre



Blair Monfre, MS, BCBA, LBA
Regional Clinical Director, Illinois

| she/her/hers

blair.monfre@totalspectrumcare.com | P: 847.337.0937

totalspectrumcare.com | [@totalspectrumcare](#)



Total Spectrum is part of LEARN Behavioral—a national organization that nurtures potential in children with autism and other special needs.

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From: [Leila Allen](#)
To: [HFS.BPPC](#)
Subject: [External] Public Notice Adaptive Behavior Support
Date: Wednesday, October 15, 2025 9:18:03 AM
Attachments: [Outlook-nxztgi4d.png](#)
[SPA Public Comment - ABS 10.2025.pdf](#)

To Whom it May Concern,

Today I am writing on behalf of Lighthouse Autism Center, an ABA therapy provider serving children and families across central Illinois. We are committed to delivering evidence-based practices for individuals with autism, and we appreciate the opportunity to provide comments on the public notice for adaptive behavior support revisions to the state plan amendment (SPA).

We commend the Illinois Department of Healthcare and Family Services (HFS) for proposing updates to professional qualifications for individuals permitted to deliver Adaptive Behavior Support (ABS) services. These changes align with the Behavior Analyst Licensing Act and introduce a pathway for qualified individuals to enroll as Registered Behavior Technicians (RBTs) while concurrently seeking full RBT certification.

Lighthouse Autism Center supports the inclusion of Licensed Assistant Behavior Analysts (LaBAs) in the HFS ABS fee schedule. We also appreciate the eligibility criteria for RBT-eligible behavior technicians who have completed 40 hours of RBT training and passed the initial competency assessment. Allowing these individuals to render supervised ABS services for up to 120 calendar days while pursuing full RBT certification from the Behavior Analyst Certification Board (BACB) will help ensure timely access to care, consistent with the Early, Periodic, Screening, Diagnostic, and Treatment (EPSDT) benefit.

We do want to note that in its current state, the IMPACT system is not set up to upload the documentation required for a competency check for technicians, it only allows a number to be entered. I encourage the Department to work with the technology team at IMPACT to ensure that the process is available and functional, prior to encouraging providers to enroll technicians with a competency assessment.

Thank you for these thoughtful policy revisions, which will improve access to care for Illinois Medicaid beneficiaries.

Sincerely,

Leila Allen, MA, BCBA, LBA (IN/MI)

Vice President of External Affairs

Lighthouse Autism Center

Leila Allen | **Vice President of External Affairs**

P:574-400-3139

215 Red Coach Dr. Mishawaka, IN 46545

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From: [IPAAQ](#)
To: [HFS.BPPC](#)
Subject: [External] Public Notice Adaptive Behavior Support
Date: Monday, October 20, 2025 4:01:00 PM
Attachments: [IPAAQ_Comments re SPA Oct 2025.docx.pdf](#)

Greetings,

Please find attached comments from IPPAQ in support of the State Plan Amendment for ABS services.

Thank you,

--

Rebecca Thompson, PhD, BCBA-D
President
Illinois Providers for ABA Access & Quality (IPAAQ)

From: [Mariel Fernandez](#)
To: [HFS.BPPC](#)
Subject: [External] Public Notice Adaptive Behavior Support
Date: Thursday, October 9, 2025 9:57:07 AM
Attachments: [Illinois ABS SPA-3.pdf](#)

Good morning,

I write today on behalf of the Council of Autism Service Providers (CASP). CASP is a non-profit trade association of autism service provider organizations, with a demonstrated commitment to promoting and delivering evidence-based practices for individuals with autism. CASP represents the autism provider community to the nation at large, including government, payers, and the general public. CASP provides information, education, and promotes the generally accepted standards of care for applied behavior analysis (ABA). CASP is committed to addressing barriers that impact access to quality services delivered by qualified providers.

CASP, and our member organizations in Illinois are thankful for the opportunity to provide comments on the public notice for adaptive behavior support revisions state plan amendment (SPA). You will find CASP's formal comments attached.

Best,

--

Mariel Fernandez, M.S. BCBA LBA
Vice President of Government Affairs



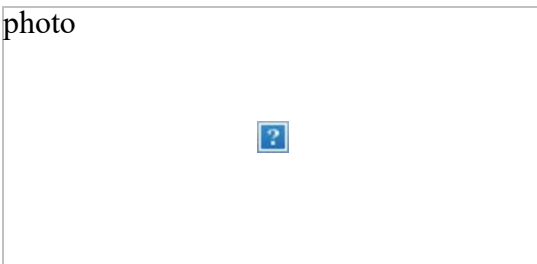
E: mfernandez@casproviders.org

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From: [Claire Ihuwan](#)
To: [HFS.BPPC](#)
Cc: [Tiffany Spicer](#); [Billing Finni](#)
Subject: [External] Question regarding: Changes in methods and standards for establishing medical assistant pay rates.
Date: Thursday, October 16, 2025 12:46:29 PM
Attachments: [pn09302025abserviceupdate.pdf](#)

Hello,

I hope this email finds you well. I am writing to inquire about the status and implementation timeline of the proposed change titled **Changes in methods and standards for establishing medical assistant pay rates**.

Specifically, I would like to know:

1. Has this change been formally approved?
2. If approved, what is the effective date or the first date of service for which it will apply?
3. If not yet approved, what is the current stage (e.g. pending CMS approval, in review, awaiting final notice)?
4. Is there a publicly available schedule or record for when final notices or rulemaking will be published?

I appreciate any documentation or links you can share (e.g. final notice, CMS approval memo, timeline).

Thank you for your time and assistance.

Sincerely,



Claire Ihuwan, M.Ed, BCBA

Provider Success Manager

Finni Health

claire.ihuwan@finnihealth.com

<https://finnihealth.com/>

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From: [Karen Dubon](#)
To: [HFS.BPPC](#)
Subject: [External] Request to Include QABA's ABAT Credential in Updated Adaptive Behavior Support
Date: Sunday, October 5, 2025 9:44:17 PM

To Whom It May Concern,

I hope this message finds you well. My name is Karen Dubon, and I am the Executive Director for the Qualified Applied Behavior Analysis Credentialing Board (QABA). I am writing to respectfully request consideration for including the Applied Behavior Analysis Technician (ABAT) credential in the Department's proposed updates to professional qualifications for individuals delivering Adaptive Behavior Support (ABS) services.

We commend the Department's efforts to align qualifications with the Behavior Analyst Licensing Act and to expand pathways for qualified individuals through the Registered Behavior Technician (RBT) designation. In keeping with this important goal, we encourage the inclusion of the ABAT credential as an additional, nationally recognized technician-level option.

The ABAT is a widely utilized, competency-based certification that prepares entry-level practitioners to deliver Applied Behavior Analysis (ABA) services under appropriate supervision. The credential is overseen by QABA, which is nationally accredited by ANSI (the American National Standards Institute), ensuring that our certification programs meet rigorous international standards for quality, fairness, and validity.

Across the United States and internationally, the ABAT has become a trusted qualification used by providers, agencies, and funding bodies to ensure that behavior technicians possess the knowledge and ethical foundation required to support individuals with autism and related developmental conditions. Including ABAT in Illinois' list of recognized credentials would align the state with national trends, broaden the qualified workforce, and expand access to care for families and individuals in need of Adaptive Behavior Support services.

We would be happy to provide additional documentation on QABA's ANSI accreditation, credentialing standards, and training pathways. Thank you for your attention to this matter and for your ongoing commitment to improving service quality and accessibility across Illinois.

Kind regards,

Karen

--

Karen Dubon, MS, QBA, BCBA, LBA

Executive Director
QABA Credentialing Board

Office: (877) 220-1839



Address: 2326 Washington Blvd, Fourth Floor, Ogden, UT 84401 USA

Website: gababoard.com



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October 8, 2025

Bureau of Program and Policy Coordination
Division of Medical Programs
Healthcare and Family Services
201 South Grand Avenue
East Springfield, IL 62763-0001
E-mail address: HFS.BPPC@illinois.gov

RE: Public Notice Adaptive Behavior Support

To Whom it May Concern,

I write today on behalf of the Council of Autism Service Providers (CASP). CASP is a non-profit trade association of autism service provider organizations, with a demonstrated commitment to promoting and delivering evidence-based practices for individuals with autism. CASP represents the autism provider community to the nation at large, including government, payers, and the general public. CASP provides information, education, and promotes the generally accepted standards of care for applied behavior analysis (ABA). CASP is committed to addressing barriers that impact access to quality services delivered by qualified providers.

CASP, and our member organizations in Illinois, are thankful for the opportunity to provide comments on the public notice for adaptive behavior support revisions state plan amendment (SPA). We appreciate the Illinois Department of Healthcare and Family Services (HFS) proposing to update professional qualifications for individuals permitted to deliver Adaptive Behavior Support (ABS) services. These changes are intended to align requirements with the Behavior Analyst Licensing Act, as well as to introduce a pathway for qualified individuals to enroll as a Registered Behavior Technician (RBT) while concurrently seeking full RBT certification.

CASP supports the inclusion of Licensed Assistant Behavior Analysts (LaBAs) to the HFS ABS fee schedule. CASP also appreciates the eligibility criteria for Registered Behavior Technician (RBT) eligible behavior technicians who have completed 40 hours of RBT training and passed the RBT initial competency assessment. Allowing these individuals to render supervised ABS services for up to 120 calendar days while concurrently seeking full RBT certification from the Behavior Analyst Certification Board (BACB) will help ensure access to care without delay, consistent with requirements of the Early, Periodic, Screening, Diagnostic, and Treatment (EPSDT) benefit.

1516 Corley Mill Road | Lexington, SC 29072

Thank you for these thoughtful policy revisions which help ensure improved access to care for Illinois Medicaid beneficiaries, and serve as an important step towards achieving network adequacy and access consistent with Section 1902(a)(30)(A) of the Social Security Act which states Medicaid programs must ensure that provider payments are “consistent with efficiency, economy, and quality of care and are sufficient to enlist enough providers” to provide access to care and services comparable to those generally available.¹

Sincerely,



Mariel C. Fernandez, MS, BCBA, LBA
Vice President of Government Affairs
(334) 332-2504
mfernandez@casproviders.org

¹ https://www.ssa.gov/OP_Home/ssact/title19/1902.htm



IPAAQ
Illinois Providers for
ABA Access & Quality

**Illinois Providers for ABA Access and Quality
(IPAAQ)**

ipaaq.org | ipaaqinfo@gmail.com

October 20, 2025

Bureau of Program and Policy Coordination
Division of Medical Programs
Healthcare and Family Services
201 South Grand Avenue
East Springfield, IL 62763-0001
E-mail address: HFS.BPPC@illinois.gov

RE: Public Comments on State Plan Amendment for Adaptive Behavior Support

To the Bureau of Program and Policy Coordination:

Thank you for the opportunity to submit public comments on the proposed State Plan Amendment (SPA) for Adaptive Behavior Support (ABS) services. I am writing on behalf of the Illinois Providers for ABA Access and Quality (IPAAQ). We are a state trade association representing Autism and ABA (applied behavior analysis) providers across the state, and our mission is to advocate for policies that protect and expand access to high quality ABA services. IPAAQ members serve over 2,200 children in IL and employ over 2800 staff members.

IPAAQ would like to express our gratitude for the team members at the department of Healthcare and Family Services (HFS), who have been generous with their time, meeting with IPAAQ and providers on a regular basis to discuss enhancements to the state plan. The proposed SPA reflects our collaborative efforts and is much appreciated. By adding licensed assistant behavior analysts as reimbursable providers for supervision services and allowing Technicians to render services for 120 days following passing a competency assessment (while they apply for RBT status) this SPA will significantly improve access to quality ABS services. We are grateful for these practical improvements to the policy which will have a meaningful impact on service access without increase costs to the state.

We celebrate HFS's efforts to collaborate with community stakeholders and drafting this much welcomed SPA.

With Gratitude,

Rebecca L. Thompson, PhD, BCBA-D, LP, LBA
President
Illinois Providers for ABA Access and Quality (IPAAQ)



Lighthouse Autism Center
E. Moline, Champaign, Springfield, Decatur

October 15, 2025

Bureau of Program and Policy Coordination
Division of Medical Programs
Healthcare and Family Services
201 South Grand Avenue
East Springfield, IL 62763-0001
E-mail address: HFS.BPPC@illinois.gov

RE: Public Notice Adaptive Behavior Support

To Whom it May Concern,

Today I am writing on behalf of Lighthouse Autism Center, an ABA therapy provider serving children and families across central Illinois. We are committed to delivering evidence-based practices for individuals with autism, and we appreciate the opportunity to provide comments on the public notice for adaptive behavior support revisions to the state plan amendment (SPA).

We commend the Illinois Department of Healthcare and Family Services (HFS) for proposing updates to professional qualifications for individuals permitted to deliver Adaptive Behavior Support (ABS) services. These changes align with the Behavior Analyst Licensing Act and introduce a pathway for qualified individuals to enroll as Registered Behavior Technicians (RBTs) while concurrently seeking full RBT certification.

Lighthouse Autism Center supports the inclusion of Licensed Assistant Behavior Analysts (LaBAs) in the HFS ABS fee schedule. We also appreciate the eligibility criteria for RBT-eligible behavior technicians who have completed 40 hours of RBT training and passed the initial competency assessment. Allowing these individuals to render supervised ABS services for up to 120 calendar days while pursuing full RBT certification from the Behavior Analyst Certification Board (BACB) will help ensure timely access to care, consistent with the Early, Periodic, Screening, Diagnostic, and Treatment (EPSDT) benefit.

We do want to note that in its current state, the IMPACT system is not set up to upload the documentation required for a competency check for technicians, it only allows a number to be entered. I encourage the Department to work with the technology team at IMPACT to ensure that the process is available and functional, prior to encouraging providers to enroll technicians with a competency assessment.

Thank you for these thoughtful policy revisions, which will improve access to care for Illinois Medicaid beneficiaries.

Sincerely,



Lighthouse Autism Center
E. Moline, Champaign, Springfield, Decatur

Leila Allen, MA, BCBA, LBA (IN/MI)

Vice President of External Affairs

Lighthouse Autism Center

October 20, 2025

Bureau of Program and Policy Coordination
Division of Medical Programs
Healthcare and Family Services
201 South Grand Avenue
East Springfield, IL 62763-0001
E-mail address: HFS.BPPC@illinois.gov

RE: Public Comments on State Plan Amendment (SPA) for Adaptive Behavior Support (ABS)

To Whom it May Concern:

I am writing on behalf of Total Spectrum. We provide applied behavior analysis (ABA) services to 325 children with autism in Illinois, and we employ over 200 clinicians. We have been offering autism services for other 10 years and proudly serve children and families across the Midwest. We appreciate the opportunity to offer public comment on the SPA for ABS services.

We want to express our strong support for the policy changes included in the proposed SPA. We are grateful for HFS's efforts to engage with providers and community stakeholders. The proposed SPA reflects months of collaboration, and we are eager to see these changes implemented. Service access will be greatly enhanced by allowing technicians who have passed a competency assessment to render services for 120 days while they seek certification as an RBT. This is a practical solution, as it will increase the workforce without compromising quality. We also support recognition of assistant behavior analysts. Including this middle tier supervisor will allow licensed behavior analysts to oversee more cases in a responsible and cost-effective manner. The opportunity to conduct some supervision activities under the close oversight of a licensed behavior analyst will provide licensed assistant behavior analysts with additional clinical experience, making the network of service providers stronger.

Thank you for proposing these thoughtful changes in the SPA.



Blair Monfre, MS, BCBA, LBA
Regional Clinical Director
Total Spectrum