



Expanding DDD's Definition of Behavioral Health Providers Who May Provide Behavioral Support Services to the IDD Community in NJ

NJPA supports the proposal of the [Alliance for Betterment of Citizens with Disabilities](#) to expand the providers for individuals with IDD (Intellectual and Developmental Disabilities) to include licensed clinical psychologists. The mental health needs of persons with developmental disabilities often go unaddressed, as research has shown. This can be addressed by a determination by DDD that provision of Behavioral Support may include psychologists, per the discretion allowed by CMS for DDD to set the qualifications for provision of behavioral support. Psychologists treat mental health conditions. Mental health conditions may affect behavioral issues addressed by BCBAs, and psychologists' contribution to BCBA care can be beneficial.

Failing to ensure their access to psychological services represents both a form of discrimination against the developmentally disabled community, as well as a restraint of trade toward psychologists who could fill a gap of needed services.

Therefore, we support the [ABCD white paper proposal](#) of December 14, 2023 and of [July 26, 2023](#) to expand the range of Behavior Supports and development of Behavior Support Plans to include licensed psychologists. They cite [DHS' acknowledgment](#) that while persons with IDD suffer from rates of mental illness at two to three times the general population, "studies show that too many systems of care for people with IDD continue to focus on controlling and managing challenging behavior without adequate consideration of the potential for underlying mental health or medical conditions as the causes of the behavior." (p. 42). As National Core Indicators surveys show, New Jersey has lagged in the provision of these services to its residents in comparison with other states.

[The most recent NCI data](#) shows that in New Jersey, the rate of our citizens with behavior plans was half the average across states (13% versus 26%). This data has also shown that those who are receiving psychiatric medications for a behavior challenge also drastically lagged the average for behavior plans across states (35% versus 56%). Psychologists can fill this gap, so that people are not medicated without the opportunity for therapy, and that behavioral problems that can be managed in part through therapy are helped accordingly. Yet psychologists and psychological services are mentioned nowhere in the NCI In Person Survey (IPS) 2020-2021 New Jersey Report.

Mental health conditions can worsen cognitive, behavioral, and physical functioning. To deprive New Jersey citizens with IDD of the opportunity to function at their best through better mental health is unnecessary, and can be remedied by a DDD decision to define behavior support and plan services as under the purview of psychologists and other licensed mental health providers.

Approved by the NJPA Executive Board on March 15, 2024