



March 26, 2026

To:

Dr. Mary Luchies

State Administrative Manager—Autism & Developmental Disabilities Services, MDHHS

Mrs. Raymie Postema

Director—Office of Recipient Rights, MDHHS

As the Michigan Behavior Analysis Provider (MiBAP) Association, we write to request a meeting to review and discuss how Community Mental Health Service Programs (CMHSP) across Michigan implement recipient rights requirements when working with contracted Behavioral Health providers, specifically Applied Behavior Analysis (ABA) therapy organizations.

As ABA services operate within the broader behavioral health system, clear and consistent expectations regarding recipient rights protections are essential. Currently, practices and interpretations vary significantly across CMH regions, particularly around:

- Recipient rights expectations for contracted ABA staff:
 - When to report?
 - What to report?
- Reporting procedures
- Definitions of rights violations within ABA service delivery
- Reconciliation of ABA best practices with CMH definitions
- Alignment between state-level standards and local CMH implementation
- Communication channels and collaboration between Michigan Office of Recipient Rights (ORR) and ABA providers

These inconsistencies create challenges for families, CMH partners, and ABA agencies striving to adhere to Michigan's robust recipient rights standards. Working together would reduce the inconsistencies across the state, improve compliance, increase transparency, and strengthen protection for individuals receiving services.



We respectfully request a meeting with Dr. Mary Luchies and Mr. Raymie Postema, and additional CMHSP representatives at your discretion, to address the following.

1. Review current statewide recipient rights expectations and the clinical practice of ABA therapy
2. Identify areas where clarification or alignment is needed
3. Discuss opportunities to streamline CMH/provider communication and training requirements
4. Explore development of standardized guidance and best-practice recommendations for CMH and ABA collaboration

Our goal is to work collaboratively to ensure that individuals receiving ABA services through Michigan's behavioral health system experience consistent rights protections, regardless of their region or funding source. Additionally, we aim to ensure that quality, scientifically validated, best practice standards of care are permissible for all providers to enhance individual skill development while reducing maladaptive behavior without being misinterpreted as rights violations.

We are available to meet virtually or in person and can provide materials and scenario/question examples in advance to assist in preparing for our time together. Your availability for the coming weeks may be communicated to our Executive Director, Dr. Holly McKee, at membership@mibap.com or 269.460.0517.

Thank you for your partnership and for your ongoing commitment to protecting the rights and dignity of Michigan residents receiving behavioral health services.

On behalf of the MiBAP Board of Directors,

Holly M. McKee

Holly McKee, PhD
Executive Director
Michigan Behavior Analysis Providers Association
membership@mibap.org
269.460.0517