



The Voice of Behavior Analysis in Connecticut

PO Box 138 • Milford CT • 06460-0138
www.ctaba.org

August 15, 2016

Karen G. Wilson
HPA Practitioner Licensing and Investigations Section
Department of Public Health
410 Capitol Avenue
Hartford, CT 06134

RE: Resubmission of Scope of Practice for the profession of behavior analysis

Dear Ms. Wilson,

The Connecticut Association for Behavior Analysis (CTABA) is a professional organization that seeks to assist in the development and advancement of the field of behavior analysis within the state of Connecticut through research, education, and dissemination of information. CTABA represents behavior analysts in Connecticut, with a current membership of over 430 persons certified at the bachelor's, master's or doctoral level by the Behavior Analysis Certification Board® (BACB).

Behavior analysis practitioners are currently credentialed in the form of an international certificate program administered through the BACB. However, there is growing interest in licensure for behavior analysis practitioners at the state level. Twenty-six other states have already licensed the practice of behavior analysis in their states. Reasons for moving in this direction include protecting the rights of behavior analysts to practice their discipline and increased consumer protection (APBA, 2009).

As such, we are submitting for the third time, a scope of practice for the profession of Behavior Analysis.

Please do not hesitate to contact us regarding this submission.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark J. Palmieri", is written over a faint, larger signature that says "sup Bobbi-E".

Mark J. Palmieri, Psy.D., BCBA-D

President, CT ABA



Scope of Practice in Behavior Analysis

The Connecticut Association of Behavior Analysis is submitting this written scope of practice to increase consumer protections for individuals receiving treatment from behavior analysts in Connecticut. Behavior analysts provide behavioral treatment to some of Connecticut's individuals with the most severe neurological and behavioral challenges, primarily children diagnosed with Autism Spectrum Disorder (ASD) though not limited to them. Behavior analysts provide services in home, school, community, and clinic settings. There is currently only a national certification (Behavior Analysis Certification Board) that governs the practice of behavior analysts in Connecticut. As such, the citizens of Connecticut deserve to be protected by enforcing a scope of practice for behavior analysis.

Behavior analysis is the professional practice of services under the title or description of services incorporating the words "applied behavior analysis", "behavior analyst", "behavior analysis", or "ABA" to public or private organization. Behavior analytic services. Behavior-analytic services means, "*the application of empirically established principles of learning and motivation derived from operant conditioning in the design, implementation, and evaluation of instructional and environmental modifications by persons trained in behavior analysis per the requirements outlined by the Behavior Analysis Certification Board (BACB) to address behavioral excesses or deficits*". The practice of behavior analysis includes the empirical identification of functional relations between behavior and environmental factors, known as functional behavior assessment and analysis, and evidence-based interventions and the direct observation and measurement of behavior and the environment to produce socially significant improvements in human behavior in clinical, school, work, home, and community settings. Behavior analysts utilize contextual factors, motivating operations, antecedent stimuli, reinforcement, and other planned consequences to help individuals and groups of people develop new behaviors, increase or decrease existing behaviors, and emit behaviors under specific environmental conditions. The practice of behavior analysis expressly excludes psychological testing, diagnosis of a mental or physical disorder, neuropsychology, psychotherapy, sex therapy, psychoanalysis, hypnotherapy, and counseling as treatment modalities.

Public Health & Safety Benefits

As mentioned above, Behavior Analysts primarily provides ~~community/home~~-based treatment to individuals affected ASD. These services are supported state agencies (Birth to Three, DDS, and DCF), public insurance plans, and commercial insurance plans. There are currently no state licensure regulations in Connecticut to govern the profession, protect consumers, or investigate allegations of questionable treatment practices.

Since the ground-breaking research of Ivar Lovaas was published in 1987, applied behavior analysis (ABA) has become synonymous with providing effective evidenced-based treatment to

individuals with autism spectrum disorder (ASD). ABA is now the nationally recognized leading treatment for individuals with ASD and has been validated by hundreds of peer reviewed journal articles. Behavior analysis has also been recognized by a variety of regulatory bodies and well-respected individuals (i.e., The National Research Council, 2001; The Maine Administrators of Services for Children with Disabilities, 2000; The New York State Department of Health – Clinical Practice Guidelines, 1999; The U.S. Surgeon General's Report, 1999).

Although ABA has a massive research base demonstrating its efficacy for people with autism and related disabilities, ABA is also recognized as being effective for a wide variety of other populations including but not limited to those with other developmental disabilities, traumatic brain injury, gambling and drug addictions, and pediatric feeding disorders.

Since 1998, the BACB has been the single governing body for professionals working in the field of applied behavior analysis. Under certification, the field has thrived resulting in increased numbers of BACB certificants and the creation of new graduate training programs with coursework concentrations in applied behavior analysis (ABA). As of August 1, 2016, there are over 20,000 master's level and doctoral level Board Certified Behavior Analysts (BCBA). Moreover, 26 individual states have created licensure for behavior analysts.

BCBAs have been providing services in Connecticut for almost 20 years. During that period, BCBAs have distinguished themselves with peer-reviewed publications, increased employment on the local/state level, and have been specifically written into Connecticut's autism insurance legislation. As of August 1, 2016, there are currently over 500 master's level and doctoral level certificants who reside in Connecticut, and an estimated 50-100 additional certificants who reside outside the state but are either employed full time in Connecticut, or who regularly consult here. The number of BCBAs is increasing dramatically as the number of university training programs nationally and within the state increase. Over the last 2 years, the rate of new certificants worldwide has increased approximately 20-24% each year. BCBAs are employed statewide in public schools, private schools, hospitals, home-based service agencies, state agencies (e.g., DDS, DCF), and colleges and universities.

The primary rationale relative to the public health and safety benefits of the licensing of behavior analyst is increased consumer protections for individuals receiving behavior analytic services. Currently, the responsibility for protecting consumers served by BCBAs falls under the auspices of the BACB's Disciplinary Review Committee (DRC). The DRC has been very effective in monitoring complaints and identifying individuals fraudulently claiming certification. However, the DRC reviews only those behavioral professionals who hold a BACB certificate. An individual that practices ABA without certification and does not claim to be a BACB certificant would not be subject to the authority of the DRC. It is also important to note that the BACB has limited investigation and enforcement capacity, where the harshest action administered by the review committee is limited to the revocation of an active BACB certificate.

With the establishment of a licensed behavior analyst (LBA), there would be authority to conduct localized investigations into claims of professional misconduct or misrepresentation

using the resources of a local state investigatory department. A state licensing board investigation would also provide the DRC additional evidence for potential professional misconduct. Additionally, the DRC would also gain increased enforcement authority by referring certificants that also hold a state license to local state licensing boards for potential violations of professional practice.

BCBAs work with some of the most young, vulnerable, and needy populations in Connecticut. ABA services are often conducted in schools or homes by non-certified paraprofessional staff under the direct supervision and oversight of a BCBA. Licensure will offer families a regulated process to investigate accusations of misconduct and prosecute those who violate their scope of practice or the BACB Professional and Ethical Compliance Code. These increased regulatory standards should also serve to protect the field, as all practitioners of ABA would be subject to regulatory standards consistent with other established licensed professional disciplines who work with vulnerable populations (e.g., speech language therapists, physical therapists, and psychologists).

Some Psychologists and School Psychologists have ABA within their scope of practice. An LBA would not change their scope of practice. However, if they want to refer to themselves as LBAs, licensure would be an important distinction.

Additionally, some members of other professions such as Occupational Therapists and Speech Language Pathologists hold board certification in behavior analysis (BCBA) as well as licensure in their specialty. These individuals would be eligible as LBA.

There is only one nationally recognized certification for behavior analysts, which is obtained through the BACB. The BACB's credentialing programs are accredited by the National Commission for Certifying Agencies (NCCA) in Washington, DC. The NCCA is the accreditation body of the Institute for Credentialing Excellence. The BACB reviews the course work requirements and supervised fieldwork experience, and then provides a professionally developed, psychometrically valid and reliable written exam for those applicants who have met all qualifications. We are hopeful that the Department of Public Health would enforce regulations where treatment providers claiming to be experts in ABA are held accountable when making unsupported claims regarding their scope of practice.

Impact to Public Access to Health Care

Licensure for behavior analysts (LBA) would have a significant impact on the public's ability to access behavior analytic treatment through their health care providers. Additionally, it would allow consumers to access their self-funded plans and Medicaid easily for Autism Spectrum Disorders and other neurodevelopmental disorders. While behavior analysts have been most easily accessed by clients with autism, the expertise of the field stretches far beyond, but currently families and providers have only been able to secure services at the point of last resort when a client is already in crisis. Licensure would allow behavior analysts to act in a proactive instead of reactive manner, which leads to more effective treatment and reduces the likelihood of outplacement for clients within public schools or being removed from their homes and placed in residential facilities.

Summary of State & Federal Laws

Currently, the Department of Disability Services (DDS), Department of Children and Families (DCF), Connecticut Birth to Three (B23), the State Department of Education (SDE), and other state agencies recognize behavior analysis services as one type of available service. The agencies currently provide reimbursement to Board Certified Behavior Analysts® (BCBAs) treating individuals with ASD as well as children with other behavioral issues.

Additionally, the need for behavior-analytic services is underscored by the recent Connecticut legislative action proposed on behalf of children, adults and families: Special Act 08-5, Public Act 08-63, Public Act 09-115, Public Act 10-175, Public Act 11-228, and CGS 17b-262-1051 to 17b-262-1065, inclusive. In recognition of the increasing needs of children and adults with behavioral needs and their families to have access to services provided by licensed and trained staff (including paraprofessionals), the Connecticut State Legislature has passed five bills in the last several years related to autism spectrum disorders:

- 1) Special Act 08-5: An Act Concerning Special Education and Instructional Methods Concerning Autism and Other Developmental Disabilities, which called for a task force to be assembled to define Autism and developmental disabilities and develop recommendations for training needs of pre-service and in-service educators, administrators and paraprofessionals across the state and identify available resources for providing this training.
 - 2) Public Act 08-63: An Act Concerning Expansion of the Pilot Program for Persons with Autism Spectrum Disorders created a pilot project and ensured that such a pilot project remained in effect through June 30, 2009 (this program continues today). This program aims to provide services through the Department of Developmental Services for individuals with an Autism Spectrum Disorder who do not have an intellectual disability.
 - 3) Public Act 09-115: An Act Requiring Insurance Coverage for Autism Spectrum Disorder Therapies. The purpose of this bill is to provide insurance coverage for Autism Spectrum Disorder therapies including Applied Behavior Analysis overseen by Board Certified Behavior Analysts.
 - 4) Public Act 10-175: An Act Concerning Special Education, which requires programs offering behavior analytic services to individuals with Autism to be overseen by professionals with proper credentials including Board Certified Behavior Analysts.
 - 5) Public Act 11-228: This act makes it a felony to present oneself as a Board Certified Behavior Analyst or Board Certified Assistant Behavior Analyst without proper credentials. Penalties include a \$500 fine or up to 5 years of imprisonment or both.
- Additionally, the following sections were added to the Connecticut General Statutes:

1. 17b-262-1051 to 17b-262-1065, inclusive. Specifically, the Department of Social Services will pay for services to children with autism. Specific services include those provided by BCBAs to complete behavior assessments and develop a plan of care, and oversee the implementation of the care plan.

Current Regulatory Oversight of Profession

Currently, the state of Connecticut does not have any regulatory oversight on the profession of applied behavior analysis. If licensure is established for behavior analysts in Connecticut, a regulatory board may provide disciplinary action for those who have not met the training and ethical guidelines of a licensed behavior analyst in good standing. In addition, a regulatory board could set disciplinary measures for those who fall outside of the ethical or legal boundaries (e.g., an individual who commits a felony).

Current Education, Training and Examination Requirements

BCBAs must meet the eligibility standards established by the BACB. The BACB has established 3 options that would meet the requirements. Applicants must complete course work requirements and supervised fieldwork experience, and then pass a professionally developed, psychometrically valid and reliable written exam.

Option 1 includes the possession of a minimum a master's degree that was conferred in behavior analysis or other natural science, education, human services, engineering, medicine or a field related to behavior analysis and approved by the BACB. The course work requirements include the completion of 270 classroom hours of graduate level instruction in the following content areas and for the number of hours specified:

- 1) Ethical and Professional Conduct - 45 hours;
- 2) Concepts and Principles of Behavior Analysis - 45 hours;
- 3) Research Methods in ABA- 45 hours
- 4) Applied Behavior Analysis-
 - Fundamental Elements of Behavior Change & Specific Behavior Change Procedures – 45 hrs
 - Identification of the Problem & Assessment – 30 hrs
 - Intervention & Behavior Change Considerations – 10 hrs
 - Behavior Change Systems – 10 hrs
 - Implementation, Management and Supervision – 10 hrs
- 5) Discretionary behavior-analytic content - 30 hours

Acceptable course work must include college or university courses in behavior analysis that are taken from an institution that meet the requirements specified by the BACB. The experience requirements must be met as established and outlined in *Appendix A* by the BACB.

Option 2 includes a teaching or research option at the college level.

- 1) The applicant must have held a full-time faculty appointment for at least 3 years at a qualifying accredited university
- 2) The applicant must have taught at least 5 sections/iterations of behavior-analytic coursework.
 - The applicant must have taught at least 2 of the following behavior-analytic content areas in separate courses: concepts and principles of behavior, single-subject research methods, applied behavior analysis, and ethics in behavior analysis.
 - Each course must have been exclusively or primarily devoted to behavior-analytic content.
 - Coursework must have been taught at the graduate level
- 3) The applicant must have published one article with the following characteristics
 - Behavior analytic in nature (per Baer, Wolf, & Risley, 1968)
 - Included at least one experimental evaluation
 - Published in a high-quality, peer-reviewed journal
 - The applicant was the first, second, or corresponding author
 - The article could have been published at any time in the applicant's career

The experience requirements must be met as established and outlined in *Appendix A* by the BACB. The applicant must also take and pass the BACB exam.

Option 3 includes a doctorate/BCBA review. This option to qualify for BCBA certification requires an acceptable doctoral degree, 10 years of post-doctoral experience practicing behavior analysis, acceptable supplemental experience, and passing the BCBA exam.

Additional or Continuing Education

If a BCBA wishes to supervise assistant behavior analysts, registered behavior technicians (RBT), or pre-service behavior analysts, the behavior analyst must complete and pass an 8-hour training in supervision. The behavior analyst must also then pass a module regarding supervision requirements.

BCBAs must then complete additional requirements in order to maintain certification. Specifically, certificants must complete 32 hours of continuing education every 2 years. Four of the hours must be focused in Ethics. For individuals who wish to supervise assistant behavior analysts (BCaBAs), registered behavior technicians (RBT), or candidates completing independent fieldwork or practica, 3 credits in supervision must be earned each renewal cycle.

Summary of Known Scope of Practice

CTABA has not reviewed any other scope of practice for behavior analysts in the state of Connecticut. This is our third submission for a Scope of Practice.

Affects Existing Relationships within the Health Care System

Licensing behavior analysts would positively affect existing relationships within Connecticut's health care system. Currently, schools, families, hospitals, and others in need of services must spend valuable time and funds conducting their own research to find qualified individuals, because there is no clearly defined standard acknowledged by the state. If behavior analysts required a license, qualified professionals would become more visible. This would save families and organizations from what can be an exhausting process with inconsistent results and allow them to gain access to effective services more efficiently.

Anticipated Economic Impact and Budget Assumptions

As previously mentioned, there is no negative fiscal impact anticipated as BCBA's are already employed statewide in public schools, private schools, hospitals, home-based service agencies, state agencies (e.g., DDS, DCF), and colleges and universities.

The BACB is already charged to verify each applicant's coursework requirements and supervised experience prior to approving the applicant to complete the certificate exam. By adhering to the Model Licensure Act, it will allow for the BACB to continue providing such services for states. Connecticut could avoid costly budget items such as:

- 1) Creating, administering, evaluating, and revising a licensure exam
- 2) Creating and approving coursework requirements
- 3) Creating standards for ethical conduct
- 4) Creating and administering continued education policies and providers

As of August 1, 2016 there are over 500 master's and doctoral level certificants who would qualify for licensure in Connecticut. The number of BACB certificates worldwide grows at the annual rate 20-25% per year, and in Connecticut has been approximately 25%. Based on this rate of growth it is anticipated that by January 2017 there will be at least 600 BCBA's working in Connecticut, including those that reside out of state but are regularly employed in Connecticut. Although licensure would have a significantly positive effect on the lives of children and families affected by ASD and other behavioral disabilities, the economic impact to Connecticut would be beneficial as follows:

- 1) The professionalization of BCBA's would result in insurance companies recognizing the profession relative behavior health treatment. In addition to meeting the clinical need for behavioral health treatment, BCBA's experience an immediate economic boost relative to the number of individuals that would be served under licensure.
- 2) It is estimated that the projected 600 LBA's would pay an initial licensing fee of \$350.00 per year, and an annual renewal fee of \$250 for each subsequent year.

Year	Number of Initial Applications	Number of Renewals	Income from Initial Applications	Income from Renewal Applications	Total Annual Income	Annual Operating Expenses with 6% Increase per year	Surplus Revenue
2017	600.00	0	\$ 210,000.00	\$ -	\$ 210,000.00	\$ 56,043.00	\$ 153,957.00
2018	150.00	600	\$ 52,500.00	\$ 150,000.00	\$ 202,500.00	\$ 59,405.58	\$ 143,094.42
2019	187.50	750	\$ 65,625.00	\$ 187,500.00	\$ 253,125.00	\$ 62,969.91	\$ 190,155.09
2020	234.38	938	\$ 82,031.25	\$ 234,375.00	\$ 316,406.25	\$ 66,748.11	\$ 249,658.14
2021	292.97	1172	\$ 102,539.06	\$ 292,968.75	\$ 395,507.81	\$ 70,753.00	\$ 324,754.82
2022	366.21	1465	\$ 128,173.83	\$ 366,210.94	\$ 494,384.77	\$ 74,998.18	\$ 419,386.59
2023	457.76	1831	\$ 160,217.29	\$ 457,763.67	\$ 617,980.96	\$ 79,498.07	\$ 538,482.89
2024	572.20	2289	\$ 200,271.61	\$ 572,204.59	\$ 772,476.20	\$ 84,267.95	\$ 688,208.25
2025	715.26	2861	\$ 250,339.51	\$ 715,255.74	\$ 965,595.25	\$ 89,374.03	\$ 876,271.22

- 3) The number of new BCBA's has been increasing and is expected to continue to increase as the number of university programs grows. Based on current growth rates in this state, continued growth of 25% each year has been utilized in development of the budget projection included with this application.
- 4) Utilization of the BACB credential, testing, and administrative support will dramatically reduce the overall cost of administering a state license. It will also enable BCBA's who move to the state to readily enter the workforce.
- 5) The annual cost, associated with managing a behavior analyst licensing board, as based on the Department of Health reports is approximately \$54,843 the first year. Please see the table above projecting number of new LBAs and the annual income for initial applications and renewals.

Recognition of BCBA's within Connecticut

Public Act 10-175, Section 2 went into effect 7/1/2010. This is an education regulation, which requires school districts to utilize BCBA's, BCaBA's or another professional with ABA within their scope of practice to supervise Individualized Education Plans or 504 plans for children with autism when these plans identify ABA as a necessary component of educational services. This statute provides the following definition:

"ABA means the design, implementation and evaluation of environmental modifications, using behavioral stimuli and consequences, including the use of direct observation, measurement and functional analysis of the relationship between the environment and behavior, to produce socially significant improvement in human behavior."

Public Act 11-228 went into effect 10/1/2011. This is a title protection act, which makes it a felony offense punishable by fines and prison time up to 5 years per offense if someone misrepresents himself or herself as a BCBA/BCaBA. This statute defines the BACB, BCBA's and BCaBA's as follows:

- 1) *"Behavior Analyst Certification Board" means the nonprofit corporation established to meet the professional credentialing needs of behavior analysts, governments and consumers of behavior analysis services and accredited by the National Council for Certifying Agencies in Washington, D. C., or any successor national accreditation organization;*
- 2) *"Board certified behavior analyst (BCBA)" means a person who has been certified as a behavior analyst by the Behavior Analyst Certification Board; and*
- 3) *"Board certified assistant behavior analyst (BCABA)" means a person who has been certified as an assistant behavior analyst by the Behavior Analyst Certification Board."*

Sec. 42. Section 20-413 references the practice of behavior analysis. Specifically, the practice of speech and language pathology does not prohibit *"(6) The provision of applied behavior analysis services by a board certified behavior analyst or a board certified assistant behavior analyst, as such terms are defined in section 20-185i, in accordance with section 10-76ii."*

Also the *Connecticut General Statutes Sec. 17b-262-1052* were recently modified to include Applied Behavior Analysis as well as services provided by Board Certified Behavior Analysts. Specifically:

1. "Applied Behavior Analysis" or "ABA" means a behavioral treatment model that focuses on the careful assessment of behaviors and their underlying functions, examination of how the environment triggers and maintains behaviors and structured teaching of skills and positive behaviors. ABA is an empirical model that requires collecting and analyzing data to understand behaviors and chart progress. ABA includes a variety of individual interventions that can be selected and tailored as appropriate to each individual's needs;"
2. "Billing provider" means the licensed practitioner, licensed practitioner group, BCBA, BCBA group or behavioral health clinic that is (A) enrolled in Medicaid with a valid provider agreement on file with the department and (B) bills the department for ASD services performed by the provider or by a performing provider affiliated with the billing provider;
3. "Board Certified Behavior Analyst" or "BCBA" means an individual certified as a BCBA by the Behavior Analyst Certification Board and who provides services in accordance with such individual's scope of practice.

Licensing of BCBA's and BCaBA's in Other States

As of August 1, 2016, there are 26 states that license or certify behavior analysts (Alabama, Alaska, Arizona, Hawaii, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Mississippi, Missouri, Nevada, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Rhode Island, Tennessee, Utah, Vermont, Virginia, Washington, and Wisconsin). Each of those states specifically references the BACB credentials and/or the BACB Professional and Ethical Code of Conduct or relies on the BACB solely.

Other Related Legislation

Other than Connecticut, there are 43 other states (and Washington DC and the US Virgin Islands) that have passed insurance legislation that covers ABA, the majority of which identifies BCBA's as appropriate providers. Like Connecticut, Indiana has a Title Act protecting BCBA's.

Affect to Other Health Care Professions

It can be reasonably assumed that licensed psychologists and school psychologists, as well as special education teachers, occupational therapists, and speech and language therapists, may have issue with behavior analyst development of a State approved scope of practice in a move towards licensure. The provisions of this section shall not apply to a person who:

1. Provides behavior analysis or assists in the practice of behavior analysis while acting within the scope of practice of the person's license and training, provided the person does not hold himself or herself out to the public as a behavior analyst;
2. Is a student enrolled in a behavior analysis educational program accredited by the BACB, or a graduate education program in which behavior analysis is an integral part of the student's course of study and such student is performing such behavior analysis or assisting in behavior analysis under the direct supervision of a behavior analyst;
3. Is an instructor in a course approved by the BACB;
4. Is an assistant behavior analyst (BCaBA) or Registered Behavior Technician (RBT) working under the supervision of a behavior analyst in accordance with the standards established by the BACB;
5. Implements an intervention based on behavior analysis under the supervision of a behavior analyst; or
6. is a family member, guardian or caretaker implementing a behavior analysis treatment plan under the direction of a behavior analyst.

How Request Relates to the Health Care Profession's Ability to Practice to Full Extent of Profession

Licensure would additionally help behavior analysts to practice to the full extent of our profession.

This Scope of Practice paper was approved by CTABA Executive Council after a vote for approval by the CTABA Executive Council on August 15, 2016.

Scope of Practice Committee Members

~~John Molteni~~, PhD, BCBA-D

~~Melissa Olive~~, PhD, BCBA-D

~~Steve Wolf~~, PhD, BCBA-D

Legislative Committee Co-Chairs

Melissa Olive, PhD, BCBA-D

John Molteni, PhD, BCBA-D

CTABA Executive Council (2015-2017)

Mark J. Palmieri, PsyD., BCBA-D
President

Solandy Forte, LCSW, BCBA
Past President

John Molteni, Ph.D., BCBA-D
President Elect

Felicia Morgan, PhD, BCBA-D
Secretary

Steve Woolf, PhD, BCBA-D
Treasurer

Melissa Saunders, MS, BCBA
Applied Representative

Larry Venuk, PhD, BCBA-D
Experimental Representative

Kate Cormier
Member at Large

Jamie Jensen
Student Representative

CT ABA Members Who Contributed to Previous Scope of Practice Versions

Solandy Forte, LCSW, BCBA
Suzanne Letso, MA, BCBA
Kristine Marino, MS, BCBA
Elizabeth C. Nulty, MS, BCBA

Resources

- American Academy Of Pediatrics (2001). Policy Statement: The Pediatrician's Role in the Diagnosis and Management of Autistic Spectrum Disorder in Children. *Pediatrics*, 107, 1221-1226.
- Association of Professional Behavior Analyst (2009). Position statement on licensure. (available at www.apbathome.net)
- Autism Speaks (2016). <https://www.autismspeaks.org/state-initiatives>. Retrieved August 1, 2016.
- Behavior Analysis Certification Board, Inc. (2012). Model act for licensing/regulating behavior analysts. (available at www.BACB.com)
- Chambless, D. L., Sanderson, W. C., Shoham, V., Bennett Johnson, S., Pope, K. S., Crits-Christoph, P., et al. (1996). An update on empirically validated therapies. *The Clinical Psychologist*, 49, 5-18.
- Cohen, H., Amerine-Dickens, M., & Smith, T. (2006). Early Intensive Behavioral Treatment: Replication of the UCLA Model in a Community Setting. *Journal of Developmental and Behavioral Pediatrics*, 27, 145-155.
- Eikeseth, S. (2009). Outcome of comprehensive psycho-educational interventions for young children with autism. *Research in Developmental Disabilities*, 30, 158-178.
- Eikeseth, S., Smith, T., Jahr, E., & Eldevik, S. (2007). Outcome for children with autism who began intensive behavioral treatment between ages 4 and 7: A comparison study. *Behavior Modification*, 31, 264-278.
- Eldevik, S., Eikeseth, S., Jahr, E., & Smith, T. (2006). Effects of low-intensity behavioral treatment for children with autism and mental retardation. *Journal of Autism and Developmental Disorders*, 36, 211-224.
- Green, G. (2011). How to evaluate alternative credentials in behavior analysis. APBA Reporter #31. (available at www.apbathome.net)
- Howard, J. S., Sparkman, C. R., Cohen, H. G., Green, G., & Stanislaw, H. (2005). A comparison of intensive behavior analytic and eclectic treatments for young children with autism. *Research in Developmental Disabilities*, 26, 359-383.
- Lovaas, O. I. (1987). Behavioral treatment and normal educational and intellectual functioning in young autistic children. *Journal of Consulting and Clinical Psychology*, 55, 3-9.
- Maine Administrators of Services for Children with Disabilities (2000). Report of the MADSEC Autism Task Force, Revised Edition. Kennebec Centre, RR 2 Box 1856, Manchester, ME 04351, <http://www.madsec.org/Publications/AutismTaskForceReport/tabid/81/Default.aspx>. Retrieved May 11, 2011.
- National Research Council (2001). Educating Children with Autism, Committee on Educational Interventions for Children with Autism, Division of Behavioral and Social Sciences and Education, Washington, D.C.: National Academy Press.
- New York State Department of Health Early Intervention Program (1999). Clinical Practice Guideline: Report of the Recommendations: Autism Pervasive Developmental Disorders. http://www.health.state.ny.us/community/infants_children/early_intervention/disorders/autism/. Retrieved May 15, 2011.

- Reichow, B., & Wolery, M. (2009). Comprehensive Synthesis of Early Intensive Behavioral Interventions for Young Children with Autism Based on the UCLA Young Autism Project Model. *Journal of Autism and Developmental Disorders, 39*, 23-41.
- Remington, B., Hastings, R. P., Kovshoff, H., degli Espinosa, F., Jahr, E., et al. (2007). Early intensive behavioral intervention: Outcomes for children with autism and their parents after two years. *American Journal on Mental Retardation, 112* (6), 418-438.
- Rogers, S. J., & Vismara, L.A. (2008). Evidence based comprehensive interventions for early autism. *Journal of Clinical Child and Adolescent Psychology, 37*, 8-38.
- Sallows, G. O., & Graupner, T. D. (2005). Intensive behavioral treatment for children with autism: Four-year outcome and predictors. *American Journal on Mental Retardation, 110* (6), 417-438.
- Satcher, D. (1999). Mental health: A report of the surgeon general. U.S. Public Health Service. Bethesda, MD. Available at:
<http://www.surgeongeneral.gov/library/mentalhealth/chapter3/sec6.html#autism>.
Retrieved May 15, 2011.

08/15/2016 13:42 PDT

TO: 18607071983 FROM: 2035133352

Page: 16

Appendix A: BACB Fieldwork Requirements

BACB Experience Standards – ver. 8/24/2015



BEHAVIOR ANALYST CERTIFICATION BOARD - Experience Standards -

INSTRUCTIONS

This document contains all of the standards and forms for experience used to qualify for BACB certification.

All experience used toward the requirements for BACB certification must meet these standards. **The BACB requires the supervisor and supervisee review this entire document together and discuss any concerns before the experience begins.**

In addition to the experience-standards definitions, this document contains two forms for documenting experience used toward BACB certification. They are:

1. The Experience Supervision Form: This form, or equivalent, must be completed at least once during each supervision period, throughout the duration of your experience. This form must be duplicated with a copy retained by both the supervisor and supervisee.

and

2. The Experience Verification Form: This form should be completed at the conclusion of your experience. If you have multiple experiences, you will need to complete multiple forms; one for each experience. The original, unaltered form must be submitted. Forms with white-out or other alterations will not be accepted. Forms must bear the supervisor's original signature. Photocopies will not be accepted.

All applicants for certification must submit documentation of their experience using the current version of the Experience Verification Form. Previous versions of the form will no longer be accepted.

Initial exam applications should include Experience Verification Forms only. **Do not submit the Experience Supervision Forms completed during each supervisory period unless specifically requested by the BACB.**

BACB Experience Standards – ver. 8/24/2015

EXPERIENCE CATEGORIES

SUPERVISED INDEPENDENT FIELDWORK (1500 hours BCBA, 1000 hours BCaBA): To qualify under this standard at the BCBA level, supervisees must complete 1500 hours of Supervised Independent Fieldwork in behavior analysis. To qualify under this standard at the BCaBA level, supervisees must complete 1000 hours of Supervised Independent Fieldwork in behavior analysis. A supervisory period is **two weeks**. In order to count experience hours within any given supervisory period, supervisees must be supervised **at least once** during that period for no less than **5%** of the total hours spent in Supervised Independent Fieldwork. For example, 20 hours of experience would include at least 1 supervised hour.

PRACTICUM (1000 hours BCBA, 670 hours BCaBA): To qualify under this standard at the BCBA level, supervisees must complete, with a passing grade, 1000 hours of Practicum in behavior analysis within a university practicum program **approved by the BACB** and taken for graduate academic credit. To qualify under this standard at the BCaBA level, supervisees must complete, with a passing grade, 670 hours of Practicum in behavior analysis within a university practicum program **approved by the BACB** and taken for academic credit. A supervisory period is **one week**. In order to count experience hours within any given supervisory period, supervisees must be supervised **at least once** during that period for no less than **7.5%** of the total hours spent in Practicum. For example, 20 hours of experience would include at least 1.5 supervised hours.

INTENSIVE PRACTICUM (750 hours BCBA, 500 hours BCaBA): To qualify under this standard at the BCBA level, supervisees must complete, with a passing grade, 750 hours of Intensive Practicum in behavior analysis within a university practicum program **approved by the BACB** and taken for graduate academic credit. To qualify under this standard at the BCaBA level, supervisees must complete, with a passing grade, 500 hours of Intensive Practicum in behavior analysis within a university practicum program **approved by the BACB** and taken for academic credit. A supervisory period is **one week**. In order to count experience hours within any given supervisory period, supervisees must be supervised **at least twice** during that period for no less than **10%** of the total hours spent in Intensive Practicum. For example, 20 hours of experience would include at least 2 supervised hours.

For all three of the above options, no fewer than 10 hours but no more than 30 hours, including supervision, may be accrued per week. Supervisees may accrue experience in only **one category per supervisory period** (i.e., Supervised Independent Fieldwork, Practicum, or Intensive Practicum).

COMBINATION OF EXPERIENCE CATEGORIES: Supervisees may elect to accrue hours in a single category or may combine any 2 or 3 of the categories above (Supervised Independent Fieldwork, Practicum, Intensive Practicum) to meet the experience requirement, with Practicum having 1½ times the temporal value of Supervised Independent Fieldwork, and Intensive Practicum having 2 times the temporal value of Supervised Independent Fieldwork.

BACB Experience Standards – ver. 8/24/2015

STANDARDS

ONSET OF EXPERIENCE: Supervisees may not start accumulating Supervised Independent Fieldwork, Practicum, or Intensive Practicum hours until they have started attending courses required to meet the BACB coursework requirements.

EXPERIENCE TRAINING MODULE: All supervisees must pass an online, competency-based training module on BACB experience standards. The module is available via the BACB Gateway at www.BACB.com. Supervisors must also meet all supervisor qualifications, including training requirements, prior to the onset of experience. Any experience obtained after March 31, 2015 will not be acceptable if the supervisee had not yet passed this module. Any experience obtained after March 31, 2015 will not be acceptable if the supervisor had not yet completed the 8-hour training and online module. **Supervisors are responsible for ensuring their supervisees have completed the online module covering BACB experience standards prior to providing supervision of experience.**

APPROPRIATE ACTIVITIES: The supervisee's primary focus should be acquiring **new behavior-analytic skills** related to the BACB Third Edition Task List or the BACB Fourth Edition Task List as appropriate. Activities must be consistent with the dimensions of applied behavior analysis identified by Baer, Wolf, and Risley (1968) in the article "Some Current Dimensions of Applied Behavior Analysis" published in the *Journal of Applied Behavior Analysis*. **The supervisor will determine if experience activities qualify based on these sources.**

Supervisees are strongly encouraged to have multiple experiences (e.g., sites, populations) with multiple supervisors and from each of the activity areas below.

- Conducting assessments related to the need for behavioral intervention (e.g., stimulus preference assessment, functional assessment, staff performance assessment);
- Designing, implementing, and systematically monitoring skill-acquisition and behavior-reduction programs;
- Overseeing the implementation of behavior-analytic programs by others;
- Training, designing behavioral systems, and performance management;
- **Other activities** normally performed by a behavior analyst that are directly related to behavior analysis such as attending planning meetings regarding the behavior analytic program, researching the literature related to the program, and talking to individuals about the program.

Direct implementation of behavioral programs may not count for more than 50% of the total accrued experience hours. Direct implementation does not refer to all time spent working with clients. Rather, it refers to time spent delivering therapeutic and instructional procedures. Activities that are not considered direct implementation include designing behavioral programs, naturalistic observation, staff and caregiver training, researching the literature related to the program, and conducting assessments related to the need for behavioral intervention.

Examples of activities that will not count as experience include: attending meetings with little or no behavior-analytic content; providing interventions that are not based in behavior analysis; performing nonbehavioral administrative activities; and completing nonbehavioral assessments

BACB Experience Standards – ver. 8/24/2015

(e.g., diagnostic assessments, intellectual assessments), paperwork, documentation, billing, or any other activities that are not directly related to behavior analysis.

APPROPRIATE CLIENTS: Clients may be any persons for whom behavior-analytic services are appropriate. However, the supervisee may not be related to the client or the client's primary caretaker or be the client's primary caretaker. Supervisees must work with multiple clients during the experience period. (Also, see the following relevant sections of the *BACB Guidelines for Responsible Conduct for Behavior Analysts*: 1.06, 1.07, 2.0, 3.01, 3.03, 3.04, 3.05, 4.0, and 9.07.)

SUPERVISOR QUALIFICATIONS: During the experience period, the supervisor must be a Board Certified Behavior Analyst or Board Certified Behavior Analyst-Doctoral in good standing. All supervisors must (a) pass an 8-hour, post-certification, competency-based training on effective supervision and (b) pass an online, competency-based training module on BACB experience standards. Supervisors must also meet an ongoing supervision CEU requirement in order to continue providing supervision after meeting the initial supervisor requirements.

The supervisor may not be related to, subordinate to, or employed by the supervisee during the experience period. Employment does not include compensation received by the supervisor from the supervisee for supervision services. (Also, see the following relevant sections of the *BACB Guidelines for Responsible Conduct for Behavior Analysts*: 1.05, 1.06, 1.07, and 5.0.)

NATURE OF SUPERVISION: The purpose of supervision is to improve and maintain the behavior-analytic, professional, and ethical repertoires of the supervisee and facilitate the delivery of high-quality services to his/her clients. Effective behavior-analytic supervision includes:

- Development of performance expectations
- Observation, behavioral skills training, and delivery of performance feedback
- Modeling technical, professional, and ethical behavior
- Guiding behavioral case conceptualization, problem-solving, and decision-making repertoires
- Review of written materials (e.g., behavior programs, data sheets, reports)
- Oversight and evaluation of the effects of behavioral service delivery
- Ongoing evaluation of the effects of supervision

The supervisor must observe and provide feedback to the supervisee on his/her behavior-analytic activities with a client in the natural environment during each required supervisory period. In-person, on-site observation is preferred. However, this may be conducted via web-cameras, videotape, videoconferencing, or similar means in lieu of the supervisor being physically present; synchronous (real-time) observation is strongly encouraged.

Supervision may be conducted in small groups for no more than half of the total supervised hours in each supervisory period. Small groups are interactive meetings in which 2-10 supervisees who share similar experiences participate in the supervision activities described above. If non-supervisees are present during the meeting, their participation should be limited so as to increase the interaction opportunities of supervisees. The remainder of the total supervision hours in each supervisory period must consist of individual supervision.

BACB Experience Standards – ver. 8/24/2015

SUPERVISION CONTRACT: The supervisee and supervisor must execute a written contract prior to the onset of the experience. The purpose of the contract is to protect all involved parties and align experience activities with the purpose of supervision described under Nature of Supervision (below). The contract should:

- State the responsibilities of the supervisor and supervisee, including completion of the online experience training module by both the supervisor and supervisee as well as completion of the 8-hour supervision training by the supervisor; and
- Include a description of the appropriate activities and instructional objectives; and
- Include the objective and measurable circumstances under which the supervisor will sign the supervisee's Experience Verification Form when the experience has ended; and
- Delineate the consequences should the parties not adhere to their responsibilities (including proper termination of the relationship); and
- Include a statement requiring the supervisee to obtain written permission from the supervisee's on-site employer or manager when applicable; and
- Include an attestation that both parties will adhere to the *BACB Guidelines for Responsible Conduct for Behavior Analysts* and the *BACB Disciplinary and Ethical Standards*

The supervisee and supervisor are responsible for retaining and providing to the BACB, if requested, a copy of the contractual agreement.

DOCUMENTATION OF ONGOING SUPERVISION: The supervisee and supervisor are responsible for collecting documentation for each supervision period on the Experience Supervision Form during each supervisory period. One form should be completed at the end of each supervisory period. The BACB reserves the right to request this documentation at any time following an individual's application to take the certification exam. This documentation should **NOT** be submitted with an exam application unless specifically requested by the BACB.

Supervisors may develop their own version of the Experience Supervision Form. These alternative forms must include all of the following elements:

- Date of each supervisory meeting
- Duration of each supervisory meeting
- Format of each supervisory meeting (i.e., individual or small group)
- An evaluation of supervisee performance
- The total experience hours obtained during the supervisory period
- The total individual and small-group supervision hours obtained during the supervisory period
- Date lines for supervisor and supervisee indicating when the form was completed & signed
- Signature lines for supervisor and supervisee

The supervisee and supervisor are responsible for retaining and providing to the BACB, if requested, copies of supervision documentation. Supervision documentation should be retained for at least 7 years from the date of the last supervision meeting.

BACB Experience Standards - ver. 8/24/2015

These standards and forms were substantively updated in September 2012. Please ensure that you are using the most current version of the form at all times. All applicants for certification must submit documentation of their experience using the current version of the Experience Verification Form. Previous versions of the form will no longer be accepted.

MULTIPLE SUPERVISORS AND/OR SETTINGS: It is permissible to utilize multiple supervisors and/or settings within a given time-frame in order to meet these experience requirements. In such cases, all parties must take great care to ensure that the supervision contract includes all relevant parties and clearly defines all roles and responsibilities. In cases where multiple supervisors share responsibility for a supervisee's experience, they may jointly sign a single Experience Verification Form attesting to the experience as a whole.

CONTESTED EXPERIENCE: If a supervisee is unable to obtain the signature of a supervisor on the Experience Verification Form or disagrees with the total number of hours recorded on the form, the supervisee may supplement his or her application with proof of the following:

- a. A copy of the supervisory contract
- b. Copies of the signed Experience Supervision Forms completed during the experience
- c. Letters or other documentation from third parties who observed the supervisory relationship

Supervisees also must provide the supervisor with copies of the documentation they are submitting to the BACB and must include proof of provision of this information to the supervisor (e.g., certified mail receipt along with a letter from the supervisee to the supervisor). The BACB may attempt to contact the supervisor to confirm receipt of this information and to provide him or her with an opportunity to address this matter in writing. Supervisors will be asked to provide documentation of dissatisfaction/concerns regarding the experience previously provided to supervisees claiming a contested supervision. If the application is denied based on the lack of proof of supervision, supervisees will have a right to appeal this denial.

BACB Experience Standards – ver. 8/24/2015

BACB Experience Supervision Form

This form (or equivalent) must be completed at least once during each supervisory period.

Supervisee: _____ Supervisor(s): _____

Supervisory Meeting Date(s) & Duration(s): _____

Supervisory Meeting Format (check all that apply): _____ individual _____ group

This document covers the supervisory period from ____/____/____ to ____/____/____

Experience Hours Accumulated During This Supervisory Period (complete all four lines)

A) Number of independent experience hours accumulated (excluding time spent with supervisor): _____

B) Number of individual supervision hours accumulated: _____

C) Number of small-group supervision hours accumulated: _____

D) Total experience hours accumulated (add lines A through C): _____

Of the hours listed above, state the number spent in direct implementation of behavioral programs: _____

Characteristics of Supervision Conducted During This Supervisory Period (check all that apply)

_____ BACB Task List skills covered (list Task numbers): _____

_____ Specific client(s) discussed

_____ Client privacy protected

_____ Observation of supervisee (video)

_____ Observation of supervisee (in-person)

_____ Supervisory discussion & feedback (in-person)

_____ Supervisory discussion & feedback (remote)

_____ Readings: _____

Evaluation of Supervisee Performance:

S – satisfactory NI - needs improvement U - unsatisfactory N/A – not applicable

	S	NI	U	N/A
Arrives on time for supervision				
Maintains professional and courteous interactions with:				
Clients/consumers				
Other service providers				
Coworkers				
Maintains appropriate attire & demeanor				
Initiates professional self-improvement				
Accepts supervisory feedback appropriately				
Seeks supervision appropriately				
Timely submission of written reports				
Communicates effectively				
Written				
Oral				
Demonstrates appropriate sensitivity to nonbehavioral providers				
Supervisee self-detects personal limitations				
Supervisee self-detects professional limitations				
Acquisition of target behavior-analytic skills				

Overall evaluation of supervisee performance during this period (circle one): S NI U

Supervisee signature: _____ Date: _____

Supervisor signature: _____ Date: _____

**DO NOT SUBMIT THIS FORM TO THE BACB WITH THE EXAM APPLICATION
SUPERVISOR AND SUPERVISEE MUST EACH RETAIN A COPY OF THIS FORM FOR AT LEAST 7 YEARS FROM THE DATE OF
THE LAST SUPERVISION MEETING**

BACB Experience Standards – ver. 8/24/2015

BACB Experience Verification Form

SECTION A

Use one form per experience. Applicants may accrue only one type of experience at a time.

Applicant's Name: _____

Experience Hours Accumulated (complete all three lines):

- A) Number of independent experience hours accumulated: _____
- B) Number of supervision hours accumulated: _____
- C) Total experience hours accumulated (add lines A and B): _____
 Of the hours listed above, state the number spent in direct implementation of behavioral programs: _____

Experience Type Obtained (check only one):

- Supervised Independent Fieldwork
- BACB Approved University Practicum (transcript must show passing grade in approved courses)
- BACB Approved University Intensive Practicum (transcript must show passing grade in approved courses)

Experience Time-Frame:

Starting date (MM/DD/YYYY) ___ / ___ / ___ - Ending date (MM/DD/YYYY) ___ / ___ / ___
(Must NOT be prior to April 1, 2005) (Indicate specific date; do not write "present")

Supervisor's Name: _____

Supervisor's Title: _____ Telephone: _____

Experience Setting: _____ City: _____ State/Country: _____

SECTION B

Must be completed by supervisor

By signing below, I hereby attest that:

- The applicant completed the experience as specified in this policy document under my supervision and in compliance with all of the stated requirements.
- I am the responsible supervisor designated in the supervision contract with this supervisee.
- During the applicant's experience I was a Board Certified Behavior Analyst # _____

Supervisor: By signing below, you attest that ALL of the information contained on this Experience Verification Form is true and correct to the best of your knowledge.

Printed Name of Supervisor: _____

Signature: _____ Date: _____

This document must bear the original signature of the supervisor. Photocopies, faxed, or emailed copies of this document will not be accepted. Original documents that have been altered (white-out, strike-through, etc.) will not be accepted. Incomplete documents will not be accepted.