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INDEPENDENT REGULATORY  
REVIEW COMMISSION

To: Members of the Independent Regulatory Review Commission

From: Mareile Koenig and Felicia Hurewitz, Co-Facilitators, Education/Certification Sub-Committee, PA Autism Task Force (2003-2004)

Date: 3/10/10

Re: Regulation #16A-4929 Behavior Specialist

We write to comment on Proposal (IRRC Number 2820) for the creation of a Behavior Specialist Certification prepared by the Department of State, Bureau of Professional and Occupational Affairs, State Board of Medicine. As Co-Facilitators of the Pennsylvania Autism Task Force Education/Certification subcommittee, we investigated the needs of the autism community in regard to behavior specialist certification. During this two-year process we solicited input from parents, providers and other stakeholders. We are grateful the Licensing Board's proposal incorporates many of the suggestions from our task force report. Nevertheless, we suggest some changes in the regulatory language in order to clarify terms and in order to ascertain that individuals certified as behavior specialists in Pennsylvania have sufficient experience and expertise.

Section 18.524 defines the "criteria for certification as behavior specialist." We fully concur with the importance of defining criteria for this professional category. However, we believe that the criteria must be specified with greater clarity. Below is a summary of five proposed changes which would improve the regulations. **We urge the IRRC to not accept the regulations as proposed, and to request revisions as follows:**

1. Part (a) states that an applicant "... shall have received a master's or higher degree ... including a major course of study in school, clinical, or counseling psychology, special education, social work, speech therapy, occupational therapy, or another related field." We recommend that "other related fields" should be clarified, in that it should be stated to include several relevant masters degrees, including a degree in nonclinical psychology (for example a degree in Developmental Psychology), and a degree in Applied Behavior Analysis.
2. Part (b) states that an applicant "... shall have at least 1 year of experience ...". We believe that the intention of this provision was to ascertain that applicants have ample experience in the implementation of evidence-based behavioral assessments and interventions. However, the current regulations do not assure the Board that the experience was in evidence-based practices. This oversight in the regulations can be remedied by specifying the nature of the supervision during this clinical experience. We recommend that the clinical experience should include a requirement that one or more Board Certified Behavior Analysts (BCBA), Psychologist licensed by the Board of Professional Psychology, (ABPP), or an individual who has Certification as a Behavior Specialist in Pennsylvania supervises these clinical hours. Furthermore, documentation of supervised hours should include a listing of how many hours are spent in the various required

activities, including conducting FBAs. The practicum experience should result in a report by the supervisor, which certifies the hours the applicant spent at each required activity and asserts that the applicant satisfactorily passed each component of the clinical experience.

3. Part (c) states that an applicant "... shall have completed at least 1,000 hours in direct clinical experience with individuals with behavioral challenges or at least 1,000 hours of experience in a related field with individuals with autism spectrum disorders." We believe that this provision as stated would allow applicants to become certified who lack skills and training consistent with evidence-based practice. Therefore, we request that the regulatory language expand the requirement to indicate that a Board Certified Behavior Analyst (BCBA) or a Psychologist licensed by the Board of Professional Psychology (ABPP), or Pennsylvania Certified Behavior Specialist must supervise these hours. Again, the clinical experience should be documented with a breakdown of hours spent in each activity and a rating that the applicant demonstrated satisfactory performance for each component.
4. Part (d) states that an applicant "... shall have completed relevant training programs..." in various areas. Neither the number of credit hours nor the qualifications of the people giving the training is specified. We believe that these requirements need further specification in order to ascertain that applicants have obtained coursework from accredited institutions of higher learning on evidence-based practices. We recommend that the criterion be expanded to include a specific number of required credit hours at an accredited institution for higher education in each of the following areas:
  - Professional Ethics
  - Autism Specific Training
  - Assessment training
  - Instructional strategies and best practices crisis intervention
  - Co-morbidity, medication, family collaboration, and addressing specific skill deficits
5. The proposal does not honor the qualifications of individuals who are already certified by the Behavior Analysis Certification Board (BACB), the national accrediting agency that is accepted by professionals in the field of applied behavior analysis. The lack of recognition of this certification may dissuade Board Certified Behavior Analysts from moving to Pennsylvania, thereby putting our state at a disadvantage in competing for highly qualified behavior health workers. We suggest that the regulations allow individuals who are Board Certified Behavior Analysts to apply for Behavior Specialist Certification in Pennsylvania. Since experience in working with individuals who have autism is not required for certification by the BACB, we recommend that the criteria for applicants with BCBA be modified to accept the BCBA to satisfy all requirements for a Pennsylvania Certified Behavior Specialist except the Autism Training experience requirements of part (c) and the Autism Training requirements in part 18.524 (d).

Thank you for this opportunity to provide input. Do not hesitate to contact us if you would like to discuss these issues further.

Sincerely,

Felicia Hurewitz, Ph.D.

Mareile Koenig, Ph.D.

**From:** Scott R.  
**Sent:** Monday, March 15, 2010 8:39 AM  
**To:**  
**Cc:** Stephen R.  
**Subject:** FW: Comments on Behavior Specialist Certification  
**Attachments:** ATF\_cert\_sub\_IRRC.pdf

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REVIEW COMMISSION

2820 comments

-----Original Message-----

**From:** Felicia Hurewitz [mailto:fdh23@drexel.edu]  
**Sent:** Sunday, March 14, 2010 9:37 PM  
**To:** st-medicine@state.pa.us; Schalles, Scott R.  
**Cc:** Mareile Koenig  
**Subject:** Comments on Behavior Specialist Certification

Attached please find input regarding Behavior Specialist Certification under the Autism Insurance Act.

Thank you for consideration of these comments.

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