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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

Sincerely,

Felicia Hurewitz, Ph.D.

Mareile Koenig, Ph.D.