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**Kathy Cooper**

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**From:** IRRC  
**Subject:** FW: IBHS regulation Comments

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**From:** christie seiler [<mailto:anchpc@lycominghealthyliving.com>]  
**Sent:** Tuesday, August 6, 2019 4:09 PM  
**To:** Scott Schalles <[sschalles@irrc.state.pa.us](mailto:sschalles@irrc.state.pa.us)>  
**Subject:** IBHS regulation Comments

Hello!

Please include my name among the list in opposition to these proposed regulations. My reasoning for this is two-fold. I first believe that these statutes violate the rights of a Licensed Psychologist and limit the scope of practice of a Psychologist. I also do not believe that Pennsylvania has established a license or a Board to govern the practice of a BCBA, which is a certification only. The proposed statutes seem to ignore these two factors.

As a Licensed Psychologist in Pennsylvania, I believe that these statutes are in opposition to the statutes that are already in place governing the practice of Psychology in Pennsylvania. Though I could see where there were some aspects of the role of Clinical Director and Supervisor that were changed (i.e., from the initial draft of the statutes) for children with conditions other than Autism Spectrum Disorder (ASD), there are still aspects of the treatment for children with ASD that can only be supervised by a BCBA (a person with a clinical license AND a BCBA). Psychologists created ABA and, now, there are statutes and programs that are proposing to eliminate Psychologists from being able to practice or supervise the provision of ABA services. This is a violation of the Professional Practice Act of Psychologists and the primary reason why these proposed regulations should be rejected.

Additionally, the BCBA's are not really governed by a board. The BCBA is a certification only. BCBA's obtain a Behavioral Specialist license in PA which, in my opinion, does not provide enough information about their scope of practice. The license also is not specific to BCBA's and, therefore, cannot outline the scope of practice that would give the BCBA's authority to perform the duties that would be afforded to them by the current statutes. The current states are in opposition to the provision of services governed by the state for the Behavioral Specialist License (i.e., the proposed statutes affords a greater independence of practice that is indicated in the current Behavioral Specialist License). Note the Behavioral Specialist License also indicates that services need to be directed by a Licensed Psychologist or Psychiatrist. If only a BCBA can provide supervision of a person providing ABA services for a person with Autism, who would be governing the behavior of the BCBA (i.e., aspects of their practice that are specific to the BCBA)? Please note that the BCBA would be providing services that these statutes are implying cannot be provided by a licensed clinician (e.g., Licensed Psychologist), alone, only a Licensed Psychologist with a BCBA. Obviously, these regulations are stating that there are provisions of the service that are outside the scope of practice for a Licensed Psychologist. Therefore, the Psychology Board should not be charged with governing the practice of ABA. So, who will? The current Behavioral Specialist License is not sufficient to govern the behaviors of an BCBA in the capacity indicated by these statutes. This would be my second reason for rejecting the regulations.

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Licensed Psychologist

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