

14-546-14 3209

Champa, Heidi

From: Michael Matthews <fecmbm@aol.com>
Sent: Sunday, August 12, 2018 1:25 PM
To: PW, IBHS
Subject: IBHS- comment

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Independent Regulatory
Review Commission

Dear Ms. Pride:

As a doctoral level psychologist licensed since 1991, I have been providing BHRS services since its inception in 1992, especially to children with an autism spectrum diagnosis. The term Applied Behavior Analysis was coined in the 1960s, well after behavioral intervention was established as standard practice by doctoral level psychologists for a half century. When I worked as a child care worker with a bachelors degree in Psychology in 1977, it was called Behavior Modification. I, along with many staff who had no college degree and no formal training in "ABA" successfully changed adolescent behavior at a residential facility. The practice of ABA is but one aspect of a multidimensional approach to treating children with autism that every doctoral licensed psychologist is more than adequately equipped to implement.

To require me and other very experienced psychologists to have had 12 credits in "Behavior Modification" or "Applied Behavioral Analysis" is like requiring an experienced surgeon to have coursework on "Scalpel Holding" and "Scalpel Sharpening." Behavioral analysis and implementation is the essence of what it means to be a doctoral level psychologist. My expertise and those similarly educated and experienced is quite beyond what a BCBA brings to the treatment of autism.

I am aware of the move in PA to allow BCBAs to provide a variety of services and treatments in areas such as suicidality, PTSD, ADHD, many others, that are quite beyond the singular training in behavioral change that a BCBA receives. I do not endorse the idea that a masters level BCBA has the training and expertise to address such issues in children with autism as the family dynamics that promote maladaptive behavior in the client, the interpersonal conflicts that may arise between clinical staff and the teachers, day care personnel, etc. who work with the child, the necessary psychotherapy required to help families and children move forward and progress, to name just a few concerns. There are many more I could cite, but my intention is to be brief here

A doctoral level licensed psychologist is trained to address all of the these issues.

In summary, requiring myself and other licensed psychologists, especially those with 20+ years experience working with children with autism, to have coursework with titles specific to a relatively recent term that is the 100 year cornerstone of the practice of psychology in general (or to get a BCBA certificate) is to deny children with autism the expertise and training of those most competent in the field.

I ask strong consideration to allow all current Licensed Psychologists who have extensive experience (5+ years?10+years?) in this population to continue to do what we know how to do (i.e. "grandfather" them) without the undue burden of additional, basic (graduate or otherwise) courses or requirements.

Sincerely,

Michael Matthews, PhD
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