

14-546-13 3209

Champa, Heidi

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**From:** David Foster <david.t.foster@outlook.com>  
**Sent:** Sunday, August 12, 2018 12:07 PM  
**To:** PW, IBHS  
**Subject:** IBHS Regulation No. 14-546

AUG 14 2018

Independent Regulatory  
Review Commission

I have recently learned of the ruling in the Sonny v Dallas case and my heart is heavy and my soul infuriated that such a mindless decision is even possible.

As the parent of a special needs autistic child, why would you even consider lowering the standards of skilled practicing BCBA services staff to that of a person with a mere BS degree? Clearly, the ruling judge has no personal experience or took the time to gather greater insight to the impact the lessor experienced practitioner has in dealing with this mental issue within our children.

In response to losing the Sonny O vs. Dallas class action law suit, it is correct to possibly understand your decision that you will scrap BHRS services and replace it with a program that enables untrained persons labeled as 'licensed' by the state to hopefully provide ABA.

Instead of 'best practice' (a BCBA supervising an RBT that works with your child), is this is truly what you are now suggesting?

The supervisor of a case for a child with an ASD only needs the following:

1. A bachelor's degree
2. 4 classes in ABA
3. 6-months experience in ABA
4. Two hours a month of supervision by a BCBA

If this is your revised program, then an untrained chiropractor is really the one making treatment decisions for my ASD child 😞:(

How can a new, untrained therapists be available to everyone with an ASD, and call it ABA therapy! Have you possibly waived some kind of magic wand and now this new thing is going to work??

With an appreciation of the BCBA skills, experience and expertise, how can you revamp this program. A BCBA should, at a minimum supervise RBT/therapists, using every shred of experience and training ever received. I can't imagine allowing this new low-standard "state licensed", "supervisor" loose on our vulnerable precious ASD population.

What an absolute disgraceful way to save money at the expense of our children.

Disgusted in your attempt to revise a program at the expense of ASD children!!

Tracy David Foster