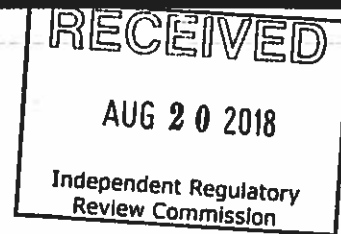


14-546-27 3209

Champa, Heidi

From: Derek Martin <dvmartin24@hotmail.com>
Sent: Wednesday, August 15, 2018 11:26 AM
To: PW, IBHS
Subject: New IBHS Regulations



Dear Representatives of the Department,

I have recently been made aware of Pennsylvania's proposed changes to ABA services. As a father of child with developmental disabilities, and an ABA clinician in training, I have a few comments to make on these changes.

I have seen first-hand the positive effects that ABA has on children. It is by far the most effective and data-driven therapy available. That being said, I do commend the department's commitment to offer ABA services to a wider pool of children who desperately need services. Overall I believe the changes are good.

The issue that I feel most passionately about is the proposed changes to qualifications for Behavior Specialists. According to 5240.81-ABA it states:

"Behavior specialist analysts shall be licensed as a psychologist, professional counselor, marriage and family therapist, clinical social worker, social worker or behavior specialist, and have a graduate or undergraduate-level certification in behavior analysis from the Behavior Analyst Certification Board or other Nationally-recognized certification board, or a current certification as a behavior specialist analyst with a competency in ABA from the Pennsylvania Certification Board, or a minimum of 12 credits in ABA and 1 year of full-time experience in the provision of ABA, or a minimum of 1 year of full-time experience in the provision of ABA under the supervision of an individual with a graduate-level certification in behavior analysis."

This last stipulation I have a problem with because it states that it would be possible for an unlicensed clinician with no formal education or certification to work as a Behavior Specialist if they work under a graduate level supervisor. In education, uncertified teachers can work as a substitute, but would not be qualified to write lesson plans and curriculum. They also tend to be seen as more incompetent by the students many times because of the lack of formal knowledge. This is the same type of situation but with children who often cannot voice their concerns.

As a certified Music Teacher, I am currently unable to work as a Behavior Specialist even with a masters degree so that I could accumulate the procedures and concepts needed to effectively work with children on the Autism Spectrum. Under these new regulations, I would easily be able to become a BSA with only limited knowledge, which would possibly cheapen the incentive to become licensed. This I believe, would certainly lower the bar for quality services and lower the number of high caliber clinicians in the field.

For the above reasons, I firmly believe that the best way we can provide the best treatment to clients is by requiring behavior specialists to have formal ABA training and certification before supervising treatment. We cannot lower our standards at the expense of our children. Instead we should be providing extra incentives for obtaining licensure and credentials, whether through fair compensation based on experience and training, or financial incentives to continue education. To require anything less would be unethical to the field.

Thank you for your consideration,

Derek Martin, BSEd/MA
Therapeutic Support Staff

Confidentiality Notice: This email message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.