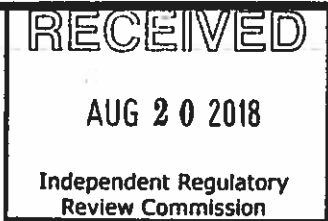


14-546-30 3209

**Champa, Heidi**

**From:** Paul Ackroyd <pjackroyd@gmail.com>  
**Sent:** Wednesday, August 15, 2018 3:31 PM  
**To:** PW, IBHS  
**Subject:** IBHS Regulation No. 14-546



I am very much against this new proposed regulation. Please consider the following:

- A bachelor level supervisor with no formal supervised experience is unethical and will harm children.
- As the citizen/consumer, my voice is very loud. A recent class action suit was won fighting low quality services
- Instead of raising rates to incentivize BCBA's to the state of PA to increase capacity and access to therapy, you've simply lowered the qualifications for supervision, and labeled it ABA Therapy.
  
- We greatly appreciate our BCBA team. As a parent, I would call my attorney before I would allow a bachelor level supervisor with no formal supervised experience loose on my ASD child.
- It is unconscionable to allow a bachelor level supervisor without formal supervised experience to make critical treatment decisions.
- Dr. Ivy, the president of our association (PennABA.com) let them know that these standards were too low, but they refused to listen because they need to increase access to ABA Therapy. RAISE REIMBURSEMENT RATES, don't lower standards! That's why BCBA's are fleeing to other states.

Would you take your child to a dentist or chiropractor with a Bachelor of Science degree

Do not pass this regulation

Paul Ackroyd