3209 14-546-40

## Champa, Heidi

From:

Angela Immediato <italiagrl08@yahoo.com>

Sent:

Wednesday, August 22, 2018 8:29 PM

To:

PW, IBHS

Subject:

1BHS Regulation No. 14-546

RECEIVED

AUG 27 2018

Independent Regulatory Review Commission

## To Whom it May Concern:

I am writing to you in response to the proposed changes to receiving ABA therapy put forth by the Pennsylvania Department of Human Services. As a mother to a child who has ASD and is currently receiving ABA therapy from a BCBA and RBT team, I am completely against lowering the standards and qualifications for supervision for persons who administer ABA therapy. The lowering of these standards, specifically the lowering of credentials now proposed to be adequate for a BCBA, including the mere requirement of a bachelor level supervisor with no formal supervised experience, is completely unethical. In fact, it directly harms children with ASD, like my son.

My son has made amazing progress in a relatively short time with the very experienced BCBA he has through Behavior Therapy International (BTI). His BCBA/RBT team have demonstrated directly, through the progress they are helping my son make on a weekly basis, that highly credentialed and trained, extensively experienced professionals administering ABA therapy make the key difference. I shudder to think what would happen to my son, or any child with ASD, whose BCBA would be replaced by a lesser qualified, lesser educated, lesser experienced professional. The difference would be my son's (or any child's) future.

This is unconscionable and unethical.

To make the proposed changes of lowering the credentials and standards of the BCBA's who administer and supervise ABA therapy is utterly incomprehensible to me as a mother, whose child needs this therapy. My son, and many other children will suffer greatly in the hands of minimally qualified persons. It is an outrage to do this to innocent children, like my son.

As a healthcare professional (Physician Assistant) myself, I could never justify taking my child to a physician with a mere Bachelor's degree, who never went through residency. In the same way, I would not entrust my child, whose future depends on the benefits from ABA therapy, to a barely qualified professional with minimal to no supervised experience. It is not logical, and is utterly unconscionable.

In the name of my child, Nicholas, I strongly oppose the lowering of these standards as proposed by the Pennsylvania Department of Human Services. I ask you to please not do this to my son, or to the countless innocent children that this implemented change would directly harm.

Respectfully in Petition, A Mother,

Angela Foreman