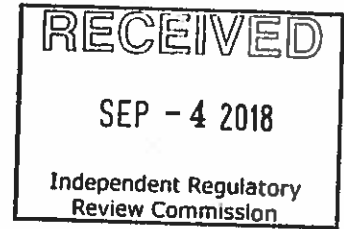


3209 14-546-68

Champa, Heidi

From: Susan Deikman <deikmansusan@gmail.com>
Sent: Sunday, September 02, 2018 11:09 AM
To: PW, IBHS
Subject: IBHS Regulation No. 14-546



To Whom it may concern,

I am writing in regard to the proposed IBHS regulation no. 14-546. I am both a parent of a child diagnosed with autism and recipient of ABA services, as well as a Board Certified Behavior Analyst (BCBA) and PA Licensed Behavior Specialist (LBS), providing services to children diagnosed with autism and their families.

I object to the new low standards that are being proposed! Lowering standards of practice will result decreased efficacy of services and harm to children, as well as increased cost to the state.

It's clear that these standards are not in line with best practice and not evidence based. They need to be rewritten in consultation with a professional from the Behavior Analytic Certification Board, the nationally recognized credentialing body for ABA. No other certification board is able to qualify ABA professionals and therefore should not be referenced.

A few items of concern:

5240.75 Individual Services Provision (pages 55/56), Behavior Specialist: parent training/consultation and teacher training/consultation are not included. These are vital components to ABA programs, since the way that behavior change is accomplished is through changing the environment, which includes parents and teachers. There are numerous studies to support parent and teacher training and consultation as effective, resulting in better outcomes with fewer intervention hours.

5240.12 section b. (pages 33) Staff qualifications: Clinical Director, omits PA licensed Behavior Specialist and the proposed BSC. LBS and BSA should be added to this list.

5240.81: Staff Qualifications: The regulations currently list a variety of pathways for a Behavior Specialist Analyst to obtain certification adequate to practice in this Commonwealth. It should be noted that while 1 pathway is through holding a certification from the Behavior Analyst Certification Board (BACB) for both master's level and bachelor's-level providers, there are 3 alternative certifications or experience-only based pathways allowed under this section. These alternative mechanisms to qualify for this title (BSA) are vastly different and far inferior compared to the industry's recognized lowest qualification which is through the BACB. It should also be stated that any reliance on the PACERTBOARD for any type of ABA related certification should be removed. There is no current certification in place now and this board has no prior experience or expertise in certifying behavior analysts.

5240.81(b) Qualifications state that the director must be PA licensed so until PA adopts a license for BCBA's, they cannot serve as clinical director unless they also have a license in another unrelated specialty.

5240.81(c) Behavior Specialist Analyst (BSA) refers to competency of ABA services from an unrecognized association with no ties to, or knowledge of, the field of behavior analysis. That is to say, this Board (<https://www.pacertboard.org>) currently certifies addiction counselors & mental health peer specialists and has no reference or requirements for expertise in Applied Behavior Analysis. As noted above, PACERTBOARD is not itself a credentialed entity. Any attempt to rely on the PACERTBOARD for any certification should be removed. Further, there is no requirement for competency in ABA to qualify as a service provider of Applied Behavior

Analysis. Whether chosen accidentally and unknowingly or deliberately, the only certifying body that should be involved in ABA regulations should be the BACB.

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Best regards,

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