

14-546-105 3209

SEP 17 2018

Champa, Heidi

From: Pride, Tara
Sent: Monday, September 17, 2018 9:09 AM
To: PW, IBHS
Subject: FW: IBHS Proposed DHS Regulation No. 14-546 - Comment

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SEP 19 2018

Independent Regulatory
Review Commission

From: Christian Hedegard [mailto:chedegard@ibc-pa.org]
Sent: Tuesday, September 04, 2018 5:35 PM
To: Pride, Tara <tpride@pa.gov>
Subject: IBHS Proposed DHS Regulation No. 14-546 - Comment

From: Chris Hedegard
To: T. Pride
Date: 9/4/2018
Subject: Comment RE: IBHS Proposed DHS Regulation No. 14-546

I am a licensed psychologist practicing for 26 years. My work in the human services field began in 1973. My experience includes work in many treatment settings and treating the behavioral disorders of many children and adults. During the past 10 years, I have had the privilege to treat people of all ages who function on the Autism spectrum, each with a slightly different presentation. Treatment had to be tailored to the individual. The proposed regulations appear to imply that Autism treatment = ABA and ABA = BCBA. (I hope this is only an impression.) Clients with Autism have the right to effective treatment. Treating everyone with Autism using the same approach reminds me of Maslow's *Law of the Hammer*, (paraphrased, if one's only tool is a hammer, one treats everything as if it were a nail.) Again, ABA / behavior analysis / behavior modification is *one* approach. Further, I disagree with the proposed requirement for licensed psychologists to have an additional license to perform ABA services. ABA is an approach *developed by psychologists*. Behavior analysis is a distinct school of thought in the field of psychology. It is one technique of many used by psychologists to bring about behavior change. Behavior analysis has been successfully practiced by psychologists for decades. Certainly, psychologists practicing this approach are prepared by training and supervised practice. However, additional credentialing is unnecessary.

Thank you for your consideration of my comments,

I see the need for a revamping of BHRS, which these regulations certainly intend to accomplish. However, I request that my concern is considered in a revised version of the proposed IBHS regulations.

Chris Hedegard, MA
Licensed Psychologist

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