



Re: SB 696

April 5, 2015

Chair and Members of the Senate Health Care Committee:

I am a Board Certified Behavior Analyst and have practiced in Central and Southern Oregon since 2007. I am also Policy Chair for the Oregon Association for Behavior Analysis (ORABA) and Chair of the Behavior Analysis Regulatory Board (BARB), though my views presented here do not necessarily represent those of the BARB.

I worked closely with Senator Bates and other stakeholders in 2013, and sincerely appreciate the efforts of legislators in making insurance coverage for ABA treatment for autism a reality for Oregon's families. Those legislative efforts have made a difference in the lives of many Oregonians. However, there are challenges in the provider regulation set forth in SB 365, and SB 696 represents an opportunity to address those challenges.

SB 696 proposes changes to the regulation of providers of Applied Behavior Analysis (ABA) services, yet to date providers have not been directly involved in drafting language for the bill. A diverse group of autism treatment providers and consumers, including BCBA's, SLPs, OTs, and licensed psychologists, met on Saturday and agreed on a list of recommendations for Senator Bates and the Senate Health Care Committee. I strongly urge you to accept the recommendations put forth by ORABA and other provider and consumer groups, including the following:

- The Behavior Analysis Regulatory Board (BARB) should regulate Licensed Behavior Analysts and Licensed Assistant Behavior Analysts and the practice of ABA.
- Other licensed health care providers who use ABA techniques under the auspices of their own professional certifications or licenses and within the bounds of their training and competence should not be required to register with the BARB.
- To reflect the changes above, the BARB should no longer include a Speech and Language Pathologist and should include a Licensed Assistant Behavior Analyst. The BARB public member should be changed to a consumer of ABA services.
- Interventionists should be regulated by an independent registry, with specific requirements for background checks, training, and supervision.

Thank you for your time, and I look forward to future cooperation between legislators and other stakeholders, including ABA providers.

Kind regards,

Jenny Fischer, MS, BCBA, Licensed Behavior Analyst