



Re: SB 696

Chair and Members of the Senate Health Care Committee:

We sincerely appreciate the efforts of Senator Bates and other legislators to secure insurance coverage of autism treatment for Oregon consumers. The legislation passed in 2013 is making a difference in the lives of many families in Oregon. However, the regulatory framework set forth in 2013 has proved problematic.

SB 696 proposes changes to the regulation of providers of 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 met on Saturday and agreed on a list of recommendations for Senator Bates and the Senate Health Care Committee.

ORABA strongly supports the recommendations of the group, including the following:

That the Behavior Analysis Regulatory Board (BARB) will regulate the title of licensed behavior analysts and licensed assistant behavior analysts, and will regulate the practice of applied behavior analysis by the board's licensees. Other licensed providers will be regulated by their respective boards, not the BARB. We agree that other health professionals will be reimbursed for use of ABA techniques under the auspices of their own professional certifications or licenses and within the bounds of their training and competence according to existing mental health parity laws and the provisions of SB696, allowing consumers of ABA services greater access to a range of services.

We agree that the speech-language pathologist on the BARB should be replaced with a Licensed Assistant Behavior Analyst and that the public member should be replaced with a consumer of ABA services.

We agree that there should be a separate registry for "interventionists" similar to the structure of DHS or the child-care registry. This registry would be housed within the Oregon Health Authority's Health Licensing Office and will require that interventionists meet the following criteria:

- a. High school diploma or GED
- b. At least 18 years of age
- c. A federal and state criminal background check with fingerprinting
- d. Complete initial 40 hours of training in ABA to be determined by the Oregon Health Authority by administrative rule through the use of a Rules Advisory Committee

e. Ongoing direct training and supervision by a licensed behavior analyst or other licensed health care professional

Again, we sincerely appreciate the efforts of Senator Bates and other legislators to secure insurance coverage of autism treatment for Oregon consumers. We look forward to working with legislators to pass a bill that corrects the current issues with ABA provider regulation and meets the needs of providers, consumers, and other stakeholders.

Kind regards,

The ORABA Board