

April 8, 2015

Dear Senator Dr. Alan Bates,

I am writing this letter to express both my appreciation and concerns regarding the SB 696. As someone who has worked with families and children with autism for over a decade, I am very grateful for the attention that has been given to services available for individuals with autism in the state of Oregon. I would like to thank Senator Bates for his longstanding support and work on SB 696.

As a practitioner who has experience in school, clinic, and home settings, I believe I have a firm understanding of the variety of practices that are commonly delivered to children with autism.

Before becoming a Board Certified Behavior Analyst (BCBA), I taught in self-contained and inclusive settings for five years. As a special education teacher, I utilized many of the principles of applied behavior analysis (ABA) in my classroom as well as practices based in other theoretical frameworks. Additionally, in this role, I collaborated with many Speech Language Pathologists (SLPs), Occupational Therapists (OTs), and other related service personnel.

Following my teaching experience, I worked as a clinic-based and home-based therapist, providing intensive applied behavior analytic services to children with autism while enrolled in coursework in order to sit for the BCBA exam and become certified. This experience differed drastically from my experiences teaching. Specifically, I was directly supervised by a BCBA, which included significant amounts of performance feedback. Clients were assessed often using specific applied behavior analytic curriculum based assessments, and the amount of data collected and graphed for visual analysis was extensively more.

I point this out because, although as a special education teacher I utilized many of the principles of ABA, I was not providing ABA therapy, and I did not have the depth of understanding of the science necessary to do so until receiving my BCBA.

The Behavior Analyst Certification Board (BACB) has set standards for the knowledge and skills required for certification. Candidates must be supervised by a BCBA for 1500 hours and pass an exam. The Fourth Edition Task List includes three sections covering behavior analytic skills, client-centered responsibilities including ethics, and foundational knowledge, which are the conceptual underpinnings of the science of ABA. This last section alone includes 46 different concepts specific to our science and field. Without mastery of these concepts, one cannot thoroughly apply behavior analysis correctly.

Currently, I am a doctoral student at the University of Oregon, and I also work as an Academic Associate for Arizona State University's online BCBA program, wherein I instruct courses in Behavioral Assessment, Research Methods in ABA, and Behavior

Change. It is clear to me that students need structured learning opportunities and assignments directly related to BACB's Task List in order to become fluent with the requirements of a BCBA.

Here in Oregon, there are two universities offering the course work necessary to become a BCaBA (associate) or a BCBA. Additionally, to date, there are 60 online programs offering BACB approved coursework. Practitioners have options to become certified.

I fully support the recommended changes to the Behavior Analysis Regulatory Board (BARB) submitted by ORABA on April 4, 2015. I believe that other healthcare providers, including SLPs, OTs, clinical psychologists, licensed counselors, and social workers should continue to provide evidence-based practices to clients; however, they should practice within their professional realms, and file insurance claims according to the license they hold. The BARB should only license behavior analysts and assistant behavior analysts. Finally, the board membership should be changed to replace the SLP member with a licensed assistant behavior analyst, and the public member should be a consumer of ABA services delivered by a BCBA.

I greatly appreciate the work and dedication of Senator Dr. Bates and the Senate Health Care Committee to increase access to ABA services for children with autism and their families.

Thank you for your time and careful consideration of the proposed changes.

Sincerely,

A handwritten signature in black ink that reads "Tracy Jane Raulston". The signature is written in a cursive, flowing style.

Tracy Jane Raulston, M.Ed., BCBA

Board Certified Behavior Analyst, (Certification no. 1-13-14506)