

May 18, 2015

Re: Support for SB696 Autism Insurance Reform Bill

Dear Members of the Ways and Means Committee

As an occupational therapist who has specialized in the treatment of autism for over 15 of my 30 years of practice, I am writing to express my appreciation for the dedication and hard work of Senator Bates and members of the Oregon legislature who have worked diligently over the past three years on legislation designed to ensure that individuals with autism and their families have insurance coverage for evidence-based, medically necessary treatment. As the legislation continues to be refined and regulations supporting the legislation continue to evolve it is critical that the details guiding implementation of the law allow Oregon families access to a wide range of services from highly qualified providers.

Over the past few years I have been participating in ongoing discussions with Board Certified Behavior Analysts, Psychologists, Speech Language Therapists, Occupational therapists, educators, professional organizations and consumers to identify critical components to consider in implementation of the law. I believe the current version of SB 696 which recently passed the Senate Health Care Committee represents a reasonable compromise amongst all parties and well serves Oregon families. Among other things this bill affirms is that:

1. Applied Behavioral Analysis falls within the training and scope of practice of a number of fields including Behavior Analysts, Psychologists, Occupational Therapists, Speech Language Therapists and other mental health providers. Consumers benefit from having a range of choice of providers who provide intensive behavioral services that is covered by insurance.
2. It is an unnecessary conflict of interest for professional boards to regulate and govern the activities of professionals within other disciplines. Therefore the regulatory board for Behavior Analysts should regulate the practice of behavior analysts. Psychologists, occupational therapists, speech therapists and other mental health providers have state and national boards that already govern their practice. As behavioral intervention falls within the scope of practice of these professions, oversight and consumer protection for their services should continue to be regulated by their own boards.
3. Licensing and regulation of paraprofessional interventionists would be best served by the Health Licensing Office with specific criteria to be established by statute. This ensures that all providers - whether they are BCBAs licensed by the Behavior Analyst Regulatory Board or psychologists, occupational therapists, and speech therapists licensed by their respective boards – can supervise paraprofessionals without creating conflicts amongst existing boards while providing the intended consumer protections.

I respectfully urge you to consider these factors as you move forward in the development and implementation of SB696.

Respectfully Submitted

Deborah Ferguson MHS OTR/L