



Cascade
Behavioral
Intervention

PO Box 1432, Bend, OR 97709
19800 Village Office Ct, Suite 104
Bend, OR 97702
Phone: (541) 306-3483
Fax: (541) 639-8909
jenny.fischer@cascadebehavior.com



March 13, 2019

Re: SB 135

To the Chair and Members of the Senate Health Care Committee,

As the owner and Clinical Director of Cascade ABA in Bend, OR, I employ 14 staff who are licensed or registered with the Health Licensing Office as providers of applied behavior analysis (ABA) services. Prior to providing ABA services, our staff meet requirements for education, training, and background checks set forth by the state. Additionally, as Licensed Behavior Analysts, Licensed Assistant Behavior Analysts, and Registered Behavior Analysis Interventionists, our staff must comply with ongoing supervision and oversight requirements, a vital component of consumer protections. These requirements are not burdensome, and help to ensure that all of our patients receive quality care by qualified providers.

Ensuring that all ABA providers meet Oregon requirements for licensure and registration is vital to consumer protection. SB135-2 will help clarify that everyone practicing ABA in our state must have the proper training, background checks, and ongoing oversight. Additionally, SB135-1 will ensure that agencies employing ABA providers comply with state requirements as well.

Though I support the intent of the SB 135-2, I recommend making the following changes:

- Remove “**for the purpose of treating a mental, emotional or behavioral disorder**” from section 3(2). Behavior analysts work with other vulnerable populations, such as typically developing children, so regulation should not be restricted to those with a mental health diagnosis.
- Add the following **exemptions** to section 3 (2), to exempt members of our field who do not work with vulnerable members of the public:
 - Behavior analysts who practice with nonhumans, including applied animal behaviorists and animal trainers.
 - Professionals who provide general applied behavior analysis services to organizations, so long as those services are for the benefit of the organizations and do not involve direct services to individuals.
 - Individuals who teach behavior analysis or conduct behavior-analytic research, provided that such activities do not involve the direct delivery of applied behavior analysis services beyond the typical parameters of applied research.

With the above changes, I strongly support SB 135. Thank you for taking the time to hear input on this important issue.

Box 1432, Bend, OR 97709
19800 Village Office Ct, Suite 104
Bend, OR 97702



Phone: (541) 306-3483
Fax: (541) 480-2570
jenny.fischer@cascadebehavior.com

Sincerely,

A handwritten signature in black ink that reads "Jenny L. Fischer". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jenny Fischer, PhD, BCBA-D, Licensed Behavior Analyst
Clinical Director, Cascade ABA