

March 12, 2019

Re: SB 135

Dear Senator Laurie Monnes Anderson and Members of the Senate Health Care Committee,

My name is Allison Albert Holt. I am a Board-Certified Behavior Analyst that is currently licensed to work in the State of Oregon. In particular, I work with young children with Autism Spectrum Disorders, providing Early Intensive Applied Behavior Analysis.

I want to thank you for hearing testimony on SB 135. I support SB 135, *with edits to the -2 amendment of the bill*. I agree that strengthening the regulation and oversight of Applied Behavior Analysis (ABA) providers in the state is essential to consumer protection, and believe it is important to clarify that all ABA providers must be registered or licensed to practice in Oregon.

Below are my recommended revisions to SB 135 as proposed, with a rationale for each revision:

1. I recommend deleting **“for the purpose of treating a mental, emotional or behavioral disorder”** from section 3(2). Applied behavior analysis is a field that addresses behavior change across a variety of settings and populations. Behavior analysts work in educational and medical settings with consumers who may not be diagnosed with a mental, emotional, or behavioral disorder. It is important that all providers be regulated, regardless of whether those providers are working in behavioral health settings, particularly if consumers may include vulnerable populations such as children.

2. I recommend adding the following exemptions to section 3 (2), to exempt members of our field who do not work with vulnerable members of the public:

a. Behavior analysts who practice with nonhumans, including applied animal behaviorists and animal trainers. Such individuals may use the title “behavior analyst” but may not represent themselves as Licensed Behavior Analysts or Licensed Assistant Behavior Analysts unless licensed in the state of Oregon.

b. 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. Such professionals may use the title “behavior analyst” but may not represent themselves as Licensed Behavior Analysts or Licensed Assistant Behavior Analysts unless licensed in the state of Oregon.

c. 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. Such individuals may

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use the title “behavior analyst” but may not represent themselves as Licensed Behavior Analysts or Licensed Assistant Behavior Analysts unless licensed in the state of Oregon.

With the above edits, I would strongly support SB 135. In particular, I hope that SB 135 -2 will clarify that all providers of ABA services must be licensed or registered to practice, thereby providing improved consumer protection and regulation of the practice of behavior analysis in our state.

Thank you for your time and consideration.

A handwritten signature in black ink, appearing to read "Allison Albert Holt", with a long, sweeping flourish extending to the right.

Allison Albert Holt, MEd., BCBA, LBA

Clinical Supervisor

Anchor Academy