



Oregon Association for Behavior Analysis

ORABA

1800 NW 169th PL
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Beaverton, OR 97006

House Committee on Behavioral Health and Healthcare

900 Court Street NE
Salem, OR 97301

March 23rd, 2023

RE: HB 2421

Dear Representative Rob Nosse and members of the House Committee on Behavioral Health and Healthcare:

The Oregon Association for Behavior Analysis (ORABA), has reviewed HB 2421 and supports the bill's efforts to fix critical licensing and regulatory issues with the practice of Applied Behavior Analysis (ABA) in Oregon and enhances patient safety. As Licensed Behavior Analysts in Oregon providing services to vulnerable populations including children and those with developmental disabilities, addressing these issues is of high priority.

ABA is an effective and evidence-based therapeutic approach for many individuals with autism and other behavioral health conditions, to improve communication and functional skills and to decrease problem behaviors. There are currently over 1,800 professionals licensed or registered to practice ABA in the state of Oregon – providing essential behavioral health services for thousands of people. HB 2421 fixes critical gaps and issues with licensing and regulation of ABA in Oregon and improves consumer safety. Here are a few of the critical issues that HB 2421 will fix:

- Child abuse reporting: unlike essentially every other professional that has any contact with children, ABA providers are currently exempt from the responsibility to report child abuse.
- Professional misconduct by ABA interventionists: due to a drafting error, the Health Licensing Office currently has NO authority to discipline the Registered Behavior Analysis Interventionists who work most closely with children. This means that even if an interventionist is convicted of abusing a patient, there is no way to rescind their registration authorizing them to practice ABA.
- Duty to report unprofessional conduct, arrests, and convictions: Oregon requires all other health professionals to report prohibited or unprofessional conduct by other licensees or their own criminal convictions – but not ABA practitioners.

Furthermore, HB 2421 aligns regulations to be more consistent with similar licensed behavioral health providers in Oregon. Though behavior analysis professionals in Oregon are currently mandated to be licensed in order to practice ABA to treat autistic individuals, the scope of practice of ABA is far wider. HB 2421 is an important step in promoting licensed behavior analysts as practitioners of other effective treatments for mental and emotional health disorders and chemical dependency as it aligns with an individual practitioner's scope of practice.

ORABA wishes to express strong support for this legislation. We urge the committee to support HB 2421.

Respectfully,

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