

I wanted to thank you for the opportunity to speak with you today about credentialing providers to do Applied Behavior Analysis. My name is David Hatfield, Dr. Hatfield. I am a licensed Clinical Psychologist and Board Certified Behavior Analyst (BCBA), as well as an Autism Commissioner for the State of Colorado. Certification of Behavior Analysis began in Florida in recognition of the need for minimum standards and competencies of care to provide ethical and effective treatment while protecting the public from unfit providers and services.

I would like to share information on why I believe certification is more appropriate for Colorado than pursuing licensure for behavior analysts.

First, certification is a model we already follow with Occupational Therapists and Speech Therapists here in Colorado.

Second, the certification of Behavior Analysis is needed in this state to safeguard our citizens.

Third, there is a nationally recognized Board whose mission is to do just this, the Behavior Analysis Certification Board or BACB.

- The BACB has established uniform content, standards, and criteria for the credentialing as well as the "best practice" and ethical standards of the behavior analysis profession.
- The BCBA credentialing program is itself accredited by the National Council for Certifying Agencies in Washington, DC. and endorsed by the Association of Professional Behavior Analysts, the Association for Behavior Analysis International and Division 25 (Behavior Analysis) of the American Psychological Association.
- Individuals who wish to become Board Certified Behavior Analysts® (BCBA®) must possess at least a Masters Degree, have 225 classroom hours of specific Graduate-level coursework, meet experience requirements of 1500 hours independent fieldwork under BCBA direct supervision, and pass the Behavior Analyst Certification Examination.
- Over 6000 certificates are currently issued by the BACB.

Fourth, the BCBA is the right certification for this because:

- BCBA certification has already been accepted in many states as the provider of choice for providing Applied Behavior Analysis.

- Many individual insurance plans provide reimbursement for BCBA certificants to provide ABA, including Cisco, Eli Lilly, Halliburton, Home Depot, IBM, Intel, Michelin, Microsoft, and Symantec.
- The Department of Defense only recognizes BACB certified persons to provide ABA. No others may do so directly or unsupervised.
- Medicare and many state Medicaid plans recognize the BCBA credential, including our own state's waiver plans.
- The BACB may issue sanctions, including, but not limited to, denials of initial certification, renewal or recertification, revocation, suspension or any other limitation of certification or combination of sanctions. This will protect our citizens.
- It will not cost the state any monies associated with the lengthy and costly process of creating a license specific to providing behavior analysis.

To recap, neither Occupational Therapists nor Speech Therapist are licensed in Colorado; the model for using national certification is a familiar, friendly, safe, and tested one.

The acceptance of the BCBA credentialing standard in Colorado will allow us to move forward. Colorado can provide safe, effective treatment for persons diagnosed with Autism now despite the economics of our times.

Thank you for your time and consideration on this matter.

David B. Hatfield, Ph.D.  
Clinical Psychologist and Board Certified Behavior Analyst  
Autism Commissioner for the State of Colorado

## About BACB

### **FAQ | International FAQ**

The Behavior Analyst Certification Board®, Inc. (BACB®) is a nonprofit 501(c)(3) corporation established to meet professional credentialing needs identified by behavior analysts, governments, and consumers of behavior analysis services. The BACB adheres to the national standards for boards that grant professional credentials. The BACB certification procedure undergoes regular psychometric review and validation, pursuant to a job analysis survey of the profession and standards established by content experts in the field.

The BACB's mission is to develop, promote, and implement a national and international certification program for behavior analyst practitioners. The BACB has established uniform content, standards, and criteria for the credentialing process that are designed to meet

1. The legal standards established through state, federal and case law;
2. The accepted standards for national certification programs; and
3. The "best practice" and ethical standards of the behavior analysis profession.

The BACB program is based on the successful Behavior Analysis Certification Program developed by the State of Florida. Similar programs were established in California, Texas, Pennsylvania, New York and Oklahoma. All of these programs transferred their certificants and credentialing responsibilities to the BACB and closed.

The Behavior Analyst Certification Board credentials practitioners at two levels. Individuals who wish to become Board Certified Behavior Analysts® (BCBA®) must possess at least a Masters Degree, have 225 classroom hours of specific Graduate-level coursework, meet experience requirements, and pass the Behavior Analyst Certification Examination. Persons wishing to be Board Certified Assistant Behavior Analysts® (BCaBA®) must have at least a Bachelors Degree, have 135 classroom hours of specific coursework, meet experience requirements, and pass the Assistant Behavior Analyst Certification Examination. BACB certificants must accumulate continuing education credit to maintain their credentials.

The Behavior Analyst Certification Board's BCBA and BCaBA credentialing programs are accredited by the National Council for Certifying Agencies in Washington, DC. The NCCA is the accreditation body of the National Organization for Competency Assurance. The BACB is endorsed by the Association of Professional Behavior Analysts, the Association for Behavior Analysis International and Division 25 (Behavior Analysis) of the American Psychological Association.

### **The Behavior Analyst Certification Board has developed:**

1. Eligibility Standards to take the BACB Certification Examinations;
2. Renewal and Recertification Standards to maintain certification;
3. Guidelines for Responsible Conduct for Behavior Analysts;
4. Professional Disciplinary Standards with appeal procedures;

5. A Certificant Registry;
6. A process to approve university course sequences and practica;
7. Procedures to approve continuing education providers;
8. Professionally developed and maintained certification examinations.

The Behavior Analyst Certification Board contracts with Pearson VUE for examination administration, and contracts with Professional Testing Incorporated for application processing, consultation, and examination development. The BACB administers the examinations three times per year in over 200 sites within the United States and over 150 sites outside the US. The BACB has approved course sequences in over 130 universities.

**Nondiscrimination** As provided in the BACB's bylaws, in conducting its activities, the [BACB] shall comply with all applicable laws that prohibit discrimination in employment or service provision because of a person's race, color, religion, gender, age, disability, national origin, or because of any other protected characteristic.

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## Defining the Field of Behavior Analysis

The field of Behavior Analysis grew out of the scientific study of principles of learning and behavior. It has two main branches: experimental and applied behavior analysis. The experimental analysis of behavior (EAB) is the basic science of this field and has over many decades accumulated a substantial and well-respected research literature. This literature provides the scientific foundation for applied behavior analysis (ABA), which is both an applied science that develops methods of changing behavior and a profession that provides services to meet diverse behavioral needs. Briefly, professionals in applied behavior analysis engage in the specific and comprehensive use of principles of learning, including operant and respondent learning, in order to address behavioral needs of widely varying individuals in diverse settings. Examples of these applications include: building the skills and achievements of children in school settings; enhancing the development, abilities, and choices of children and adults with different kinds of disabilities; and augmenting the performance and satisfaction of employees in organizations and businesses.

Because of its prominent applications on behalf of people at-risk and historical concerns for the humane treatment of consumers, applied behavior analysis has been the focus of many state regulations. In the course of defining the practice of behavior analysis and establishing certification for practitioners, some succinct regulatory definitions of the discipline have been developed. For example:

**Behavior Analysis:** The design, implementation, and evaluation of systematic environmental modifications for the purpose of producing socially significant improvements in and understanding of human behavior based on the principles of behavior identified through the experimental analysis of behavior. It includes the identification of functional relationships between behavior and environments. It uses direct observation and measurement of behavior and environment. Contextual factors, establishing operations, antecedent stimuli, positive reinforcers, and other consequences are used, based on identified functional relationships with the environment, in order to produce practical behavior change. (Florida Department of Children and Families)

**Behavior Analysis:** Means the design, implementation, and evaluation of instructional and environmental modifications to produce socially significant improvements in human behavior through skill acquisition and the reduction of problematic behavior. A behavior analysis program shall be based on empirical research, include the direct observation and measurement of behavior, and utilize antecedent stimuli, positive reinforcement, and other consequences to produce behavior change. (California Department of Developmental Services).

**Applied behavior analysis** is a well-developed discipline among the helping professions, with a mature body of scientific knowledge, established standards for evidence-based practice, distinct methods of service, recognized experience and educational requirements for practice, and identified sources of requisite education in universities. Although the above regulatory definitions provide an overview of key elements within the practice of behavior analysis, there are additional features of applied behavior analysis that should be clarified in order to even briefly define the field. For the purposes of BACB certifications and examinations, the content of applied behavior analysis is contained in the BACB Behavior Analysis Task List. This and additional information may be found elsewhere on the BACB web site.

**References:**

New York State Association for Behavior Analysis  
Florida Department of Children And Families  
California Department of Developmental Services

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Consumer Checklist    Web Resources

- CEU's & Events
- Consumers
- Credentialing**
- Find Clinician
- Membership
- Continuing Ed
- Careers
- Web Links
- Members
- CSHA Board

## ➤ Credentialing (Licensing/Certification)

Consumers should inquire about the background and fees of any professional offering speech-language-hearing services. Minimal standards for such professionals are the Certificate of Clinical Competence (CCC) from the American Speech-Language Hearing Association (ASHA), supervised clinical practicum, and receipt of a passing score on a national examination.

### Colorado State Credentialing Requirements

All audiologists who are practicing outside the public schools in Colorado must be registered with the State of Colorado. For further information on registration requirements, contact the Licensing Board at (303) 894-2464 or see the [Colorado Department of Regulation](#) web site for more information.

Currently, the only licensure required for speech-language pathologists in the State of Colorado is for those working in the schools. For further information on school licensure requirements, please contact the Colorado Department of Education, Teacher Education and Certification Unit, State Office Building, 201 E. Colfax, Denver, CO 80203, telephone (303) 866-6628.

### Speech-Language and Audiology Background

#### Usually includes:

1. Four years of undergraduate work leading to a B.A. or B.S. Degree (may include clinical work)
2. One to two years of graduate work leading to an M.A. or M.S. degree (includes clinical work)
3. National examination related to clinical competence
4. One year supervision of clinical skills leading to the ASHA Certificate of Clinical Competence (CCC-SLP or CCC-A)

Recertification requirements for audiologists are detailed by the American Audiology Association [HERE](#). ASHA requirements for audiologists and speech-language pathologists are detailed below:

### ASHA Certification Maintenance Requirements

Information regarding the 3-year CEU Maintenance Interval for both [Audiologists](#) and [Speech-Language Pathologists](#) is provided in the tables below. Answers to most AUD & SLP questions regarding maintenance of their ASHA CCCs can be found on the ASHA website. Click [HERE](#) for a direct link to the ASHA FAQ in this area.

Before January 1, 1980	January 1, 2003 and December 31, 2005
Between January 1, 1980 and December 31, 1989	January 1, 2004 and December 31, 2006
Between January 1, 1990 and December 31, 2002	Between January 1, 2005 and December 31, 2007
Between January 1, 2003 and present	Between January 1 of the year following your certification effective date and December 31 three years from that date.

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Before January 1, 1980	January 1, 2005 and December 31, 2007
Between January 1, 1980 and December 31, 1989	January 1, 2006 and December 31, 2008
Between January 1, 1990 and December 31, 1999	January 1, 2007 and December 31, 2009
Between January 1, 2000 and December 31, 2004	January 1, 2008 and December 31, 2010
Between January 1, 2005 and present	January 1 of the year following your certification effective date and December 31 three years from that date.

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## Occupational Therapy Association of Colorado

### Frequently Asked Questions

**No, Colorado has Title Protection, or a deceptive trade act. This is a state law that stipulates occupational therapy services provided to the public in Colorado must be provided/supervised by a professional who meet the three criteria**

1. Graduated from an accredited program by The American Occupational Therapy Association or World Federation of Occupational Therapists
2. Initially certified with the National Board for Certification in Occupational Therapy (NBCOT). It does not require current certification by NBCOT.
3. Successful completion of an internship supervised by an OT

#### Why doesn't Colorado have a licensure?

There are always many requests for information regarding the fact that Colorado is one of the few states without this form of regulation. This has a historical basis, as Colorado has been a national leader through our former governor Dick Lamm, as a deregulated state. The governor and this state have set up a Sunrise and Sunset Review Process, which is to promote less regulation or regulatory agencies by the state. The Sunrise Review Process includes an extensive application to the Department of Regulatory Agencies (DORA) for consideration of all regulatory agencies, such as an Occupational Therapy Licensure. The application has been unsuccessful in three attempts in 1987, 1992 and 1995. Many of the state OTAC Board Members both current and past were involved in this process. In all cases, there were extensive resources including financial and personal involvement on the part of the membership involved in these attempts. In all cases, it was the recommendation of DORA that there was no public harm suggested or proven by the occupational therapists in this state to warrant occupational therapist to be licensed, therefore we do not have either a regulatory board, licensure or a practice act. The current regulation, a Trade Deception Act passed in 1996, was an outcome of the last of these efforts. Occupational therapists do have a trademark law or protection of the public through misrepresentation of a qualified practitioner as defined by the law. The details of this law are described on previous web pages. Additionally, the Sunset Review Process also occurs in this state. This includes a periodic resubmission process to DORA to demonstrate a continued need for a regulatory agency. Just recently the Physical Therapist went through this process to demonstrate a continued need for the PT Licensure administered by DORA. In this case they were successful due to some highly publicized cases of Medicare fraud and patient sexual abuse.

#### What are the requirements to work in Colorado's public schools as an OT?

To work as a related service professional in Colorado's public schools, you must be currently certified by the National Board for Certification in Occupational therapy (NBCOT)

**AND you must have a special services license through the Colorado Department of Education (CDE). CDE oversees credentialing for teaching, administrative, and special service personnel (e.g. OTs) who work in Colorado's schools. To contact the licensing office at the Colorado Department of Education, click on [www.cde.state.co.us](http://www.cde.state.co.us).**

**Yes, IF you are initially certified by the National Board for Certification in Occupational Therapy (NBCOT), and your university or college is accredited by the World Federation of Occupational Therapists (WFOT). To get more information about how to become certified, contact NBCOT at [www.nbcot.org](http://www.nbcot.org).**

**No. We are not able to maintain an up-to-date listing of this sort. To explore fieldwork opportunities, you must contact potential fieldwork sites directly. We do not maintain a list of these sites.**

**Some employers looking to fill open occupational therapy positions advertise on the OTAC website. Visit our [employment listing](#) for an up-to-date list of advertising employers.**

**We would love to have your involvement! There are many roles that people can fill within the association based on interests and availability. Involvement may range from serving on the board to working as a committee member on a specific project. All levels of experience are welcome. To find out more, contact us at OTAC.**

**Download and print a [registration form](#). Adobe Acrobat Reader is required to view the registration form. Download the free Acrobat Reader from the [adobe website, www.adobe.com](http://www.adobe.com).**

## **Self-Insured Employers Cover ABA Intervention for Autism and Other Special Needs**

Laurie Stuebing  
Portland, OR  
APBA Autism Task Force

Many large employers self-insure under the 1974 federal Employee Retirement Income Security Act (ERISA). Although states have regulatory authority over the coverage provided to their citizens who receive health insurance plans through their employers, state authority is preempted for citizens receiving coverage directly from self-insuring large employers. Those employers often comply with state mandates to provide benefits for people with autism spectrum disorders (ASD).

Many self-insured companies have led the way in establishing health benefits for children with ASD and other special needs. Microsoft was the first company in the U.S. to cover applied behavior analysis (ABA) treatment in 2001. Now many self-insured companies cover not only ABA, but also other treatments.

When a company offers an autism benefit that includes coverage for ABA treatment, practitioners certified by the Behavior Analyst Certification Board (BACB) are usually recognized as qualified providers, the same as licensed professionals.

Because self-insured companies' benefits are subject to change, it is best to check directly with the company's Human Resources department about their current ABA benefit and provider qualifications. Each company has third party administrators (TPAs) overseeing their benefit, so BACB certificants will need to contact representatives of the TPAs to become preferred providers. Upon becoming a provider, it is essential to ask administrators which insurance billing code or codes should be used to bill for ABA services. The website of each company can be accessed by clicking on its name in the table below.

The following list of self-insured companies providing autism and/or special needs benefits is not exhaustive. There are some in every state. In addition, some self-insured companies will work with an individual family to cover treatment for their child even in the absence of an autism or special needs benefit.

<b>Company</b>	<b>Reimbursement For ABA Treatment</b>	<b>Company Locations in U.S.A.</b>
Arnold and Porter Law Firm	yes	CO, CA, DC, NY, VA,
Cisco	yes	CA
Deloitte	yes	All states except AK, ME, MT, MS, ND, NH, NM, VT, RI, SD, WV, WY
Eli Lilly	yes	All states
Greenville Hospital System	yes	SC
Halliburton	yes	AK, CA, CO, LA, OK, TX
Home Depot	yes	All states
IBM	Limited coverage	All states
Imation	yes	FL, MN, OK
Intel	yes	AZ, CA, CO, MA, NC, NM, NJ, OR, SC, TX, UT, VA, WA
Lexington Medical Center	yes	SC
Maxim Integrated Products	yes	AZ, CA, CO, FL, GA, IL, IN, MA, MI, NC, OR, RI, TX, WI
Mayo Clinic	yes	AZ, FL, MN
Michelin	yes	AL, IN, KY, NC, OK, SC
Microsoft	yes	All states except AK, DE, HI, KY, LA, MD, MS, MT, NH, NJ, NM, ND, RI, SC, SD, VT, WV, WY
Network Appliance, Inc.	yes	CA, MA, NC, MA
Progressive Group	yes	AZ, CA, CO, FL, MN, NJ, OH, OK, TX, VA, WA and small offices countrywide
Symantec	yes	AZ, CA, CO, DC, FL, GA, HI, IL, KS, LA, MA, MD, MI, MN, OH, NJ, NY, OR, PA, TN, TX, UT, VA, WA
TriQuint Semiconductor	yes	CA, CO, FL, MA, NC, OR, TX
University of Minnesota	yes	MN

**Required Coursework for BCBA:**

**Ethical Considerations - 15 hours**

**Definition & Characteristics and Principles, Processes & Concepts - 45 hours**

**Behavioral Assessment and Selecting Intervention Outcomes & Strategies - 35 hours**

**Experimental Evaluation of Interventions - 20 hours**

**Measurement of Behavior and Displaying & Interpreting Behavioral Data - 20 hours**

**Behavioral Change Procedures and Systems Support - 45 hours**

**Discretionary - 45 hours**