

Honourable Michael Coteau
Ministry of Children and Youth Services
14th Floor, 56 Wellesley Street West
Toronto, Ontario
M5S 2S3

August 17, 2017

Dear Minister Coteau:

We are writing to you today to offer recommendations in support of your ministry's mandate of ensuring children and youth with autism spectrum disorder (ASD) receive individualized and evidence-based interventions. The investment that the Government of Ontario and specifically the Ministry of Children and Youth Services has made in services for individuals with ASD is remarkable. It signals a commitment to a community that is among the most vulnerable and marginalized in our society and provides an opportunity for Ontario to demonstrate leadership at a global level. We appreciate your efforts to improve the quantity and quality of applied behaviour analysis (ABA) for children with ASD, as detailed in your recent announcements regarding the new Ontario Autism Program. We also commend your June 8th 2017 announcement on your intent to lead efforts to regulate the profession of behaviour analysis in Ontario.

As you are well aware, in 2000, the government of Ontario introduced an intensive form of applied behaviour analysis for children with ASD. At the time, there were no Board Certified Behavior Analysts[®] (BCBA[®]s) in Canada. As a result, supervision of publicly-funded applied behaviour analysis programs was restricted to Regulated Health Professionals, typically psychologists or psychological associates. The difficulty at that time was that although qualified within their separate professions, many Regulated Health Professionals may not have had any specific training or experience in the application of behaviour analysis for young children with ASD. This concern remains valid today.

Over the 17 years that have followed since the autism program's inception, the field of behaviour analysis has grown exponentially in Ontario and elsewhere. The Behavior Analyst Certification Board[®] has over 50,000 registrants with more than 550 BCBA[®]s or BCBA-D[™]s in Ontario. Those with this credential have either a Master's or a Ph.D. degree, have completed an approved course sequence, have completed a minimum 1,500 hours of supervised practice, have passed a standardized, psychometrically validated exam on their knowledge of ABA theory, principles and ethics, and maintain continuing education credits. The Behavior Analyst Certification Board has a well-developed [Professional and Ethical Compliance Code](#) with an associated disciplinary process to deal with complaints from the public.

We recognize that in any future regulation of behaviour analysts in Ontario, the credential of a BCBA[®] or BCBA-D[™] may be necessary but not deemed sufficient to provide quality oversight. We also recognize that this process is likely to occur over several years. As an interim measure, ONTABA recently developed recommendations that could be used within an Ontario Autism Program Clinical Supervisor approval process. These recommendations were based on a review of literature and practice guidelines; standards of supervision from other regulated health disciplines; existing accreditation processes and standards and legislation; and accreditation, and regulation of behaviour analysts or behaviour services within other countries, states, provinces, and jurisdictions.

In support of these guidelines, we recommend that an approved Clinical Supervisor demonstrate evidence of the outlined qualifications across all of the categories below. A detailed list of requirements is described in the document 'ONTABA Recommendations for Clinical Supervisor Qualifications in Applied Behaviour Analysis Programming for Children and Youth with Autism Spectrum Disorder'.

- Current certification as a BCBA/BCBA-D in good standing and approved as a supervisor through BACB, or a member of the College of Psychologists of Ontario (CPO) with documented expertise in ABA.
- At least 5 years post-certification (or post CPO registration) experience supervising and delivering ABA services to children and youth with ASD, with 1 year (1500 hours) delivering ABA services directly to children and youth with ASD, and half of the ABA experience involving supervisory duties.
- Completion of vulnerable sector screening/checks and possession of professional liability insurance.
- Demonstrated knowledge of Canadian and Ontario jurisprudence and ethics related to the delivery of services to children and youth.
- Demonstration of ethical billing and administrative practices.

In our opinion, the public would be better served in the interim if BCBA®s or BCBA-D™s who also demonstrate evidence of the qualifications outlined above, are able to supervise publicly-funded ABA services for children with ASD without a layer of additional supervision by RHPs. This arrangement would provide supervision by those who have the specialized training and supervised experience, and would likely be more efficient, and more affordable for families, while continuing to protect the public and increase capacity for services.

We appreciate your consideration, and hope that our recommendation and the work that has been completed to develop comprehensive recommendations for accreditation is useful to your ministry's mandate of implementing the Ontario Autism Program so that children with autism spectrum disorder receive individualized and evidence-based interventions with a continuum of support at home, at school, in the community, and as they prepare for adulthood.

Sincerely Yours,

Rosemary Condillac, Ph.D., C.Psych, BCBA-D (Psychologist and Board Certified Behavior Analyst – Doctoral Level™),

Joel Hundert, Ph.D., C.Psych, BCBA-D (Psychologist and Board Certified Behavior Analyst – Doctoral Level™),

Lisa Israel, RN, MADS, BCBA (Registered Nurse and Board Certified Behavior Analyst®)

Julie Koudys, Ph.D., C.Psych, BCBA-D (Psychologist and Board Certified Behavior Analyst – Doctoral Level™)

Tracie L. Lindblad, M.Sc., Reg. SLP (CASLPO), M.Ed., BCBA (Speech-Language Pathologist and Board Certified Behavior Analyst®)

Nancy Marchese, M.A., C. Psych., BCBA (Psychologist and Board Certified Behavior Analyst®)

Adrienne Perry, Ph.D., C.Psych, BCBA-D (Psychologist and Board Certified Behavior Analyst – Doctoral Level™),

Nicole Walton-Allen, Ph.D., C.Psych., BCBA-D (Psychologist and Board Certified Behavior Analyst – Doctoral Level™)

Rebecca Ward, Ph.D., C.Psych., BCBA-D (Psychologist and Board Certified Behavior Analyst – Doctoral Level™)

Carobeth Zorzos, M.A., C. Psych., BCBA (Psychologist and Board Certified Behavior Analyst®)

The signatories are all Regulated Health Professionals in Ontario (8 psychologists, 1 speech language pathologist, and 1 registered nurse). In addition to those qualifications, we are BCBA®/BCBA-D™s. This groups comprises the majority of Ontario's Regulated Health Professionals that are also credentialed as Board Certified Behavior Analysts. These views are the personal opinions of the signatories and not necessarily the view of their affiliated organizations.