



# **FAQs for the October 2023 Townhall**

**Re: Changes to BACB Certification  
in Ontario**

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## INTRODUCTION & OVERVIEW

Thank you to all ONTABA™ members that participated in our fall 2023 townhalls and shared questions about the upcoming changes to Behavior Analyst Certification Board (BACB) Certification in Ontario. We have reviewed your questions carefully. The questions that we were able to answer are included in this Frequently Asked Questions (FAQs) document. Further, we will be sharing relevant questions with the College of Psychologists (CPO) and the Behavior Analyst Certification Board (BACB) as appropriate.

## HISTORICAL HIGHLIGHTS

- Since ONTABA™ inception in 1993, regulation/public protection has been a goal
- Standards for professional practice were an immediate goal and were developed in 1997
- ONTABA™ struck its first certification committee in 1998, and has been pursuing public protection in different forms since then (e.g., certification, regulation, title protection)
- [Certification/Regulation for ABA Practitioners - SEG Management Consultants for MCYS \(2014\)](#)
- Title protection proposed by ONTABA™ in 2016 (Draft Private Act)
  - Registered Ontario Behaviour Analyst (ROBA)
  - Registered Ontario Assistant Behaviour Analysts (ROABA)
  - Registered Ontario Behaviour Analysis Implementer (ROBAI)
- Ontario Government begins review of the need for regulation of ABA (2017)
- HPRAC report completed in Jan 2018, and released in 2019
- In the absence of regulation, ONTABA™ launched jurisprudence and ethics standards (2020) and accompanying training to help resolve issues identified by HPRAC
- ONTABA™ response to regulation consultations described three tiers of service delivery including BCBA-Ds, BCBAs, BCaBAs (March 2020)
- Passing of Bill 283 including legislative authority for the CPO to regulate ABA (2021)
- ABA working group formed with CPO (2022)
- CPO Council approves the addition of two Behaviour Analysts as transitional, non-voting members to participate in Council meetings (2022)
- [College's Applied Behaviour Analysis Consultation Regulation Amendments \(October 2022\)](#)
  - [To prepare for proclamation for the Psychology Applied Behaviour Analysis Act, 2021](#)
- CPO and ONTABA™ disseminated call for feedback

- Summary of feedback and decisions can be found on the CPO website under CPO Council Agenda & Minutes, Dec 2022
- Was available to public as of January 30, 2023
- Summary of feedback and decisions posted on CPO website [here](#) starting on page 31
- On July 20, 2023, Lieutenant Governor in Council approved regulations under the Psychology and Applied Behaviour Analysis Act, 2021
  - Act will be proclaimed July 1, 2024
  - Pre-registration for Behaviour Analysts is expected to open shortly
- Members are encouraged to join CPO mailing list and check [here](#) for more updates

## FREQUENTLY ASKED QUESTIONS

### 1) WHY REGULATION OF BEHAVIOR ANALYSTS IN ONTARIO?

- We care about protecting the vulnerable
- We care about not misrepresenting the field to the public
- We strive to set standards and continually improve them
- Public protection is the driver
- Certification does not have the legal jurisdiction in Ontario
  - E.g., Anyone can hold themselves out to be practicing behaviour analysis in Ontario without appropriate qualifications

### 2) WHERE CAN I GET UPDATES ON REGULATION OF BEHAVIOR ANALYSTS IN ONTARIO?

- You can find updates on regulation of Behavior Analysts in Ontario here <https://cpo.on.ca/aba/>
- Members are also encouraged to join CPO mailing list and check [here](#) for more updates

### 3A) WHAT IS TITLE PROTECTION?

- Title protection means that a particular title is restricted (through legislation) to qualified members of a Regulatory Health College.
  - From the FAQ on CPO website “Once the Psychology and Applied Behaviour Analysis Act, 2021 is proclaimed, the title “Behaviour Analyst” will be a restricted title that can only be used by individuals registered with the College as Behaviour Analysts.”

- Title protection protects the public as only qualified and registered professionals can use the title

### 3 B) WHY IS THE PROTECTED TITLE “BEHAVIOUR ANALYST”?

- Spirit of title protection
- Consistent with other health professions
- Representation of qualifications to the public, and abbreviations/variations - holds yourself out to practice behaviour analysis
- Scope of practice is not protected, but describing practice as ABA is

### 4) WHAT WERE THE CHANGES ANNOUNCED BY THE BACB TO CERTIFICATION IN ONTARIO IN SEPTEMBER 2023?

As per the message from the BACB, effective July 1, 2024, upcoming changes to their certification process will include the following implications:

- Active BCBA/BCBA-Ds in Ontario will not be able to use their certification until they are registered with the College
- All current BCaBA certificants in Ontario will have their certification placed on voluntary inactive status by the BACB
- Ontario residents can no longer apply for BCaBA certification or take the examination
- All current RBT certificants in Ontario will have their certification placed on voluntary inactive status by the BACB
- Ontario residents can no longer apply for RBT certification or take the examination

Please note that the BACB has provided further details about upcoming changes **effective July 1 2024** and beyond. We encourage our members who are certified through the BACB to carefully read [the entire message](#) from the BACB because additional substantial changes pertaining to BCBA/BCBA-D certification will go into effect on July 1, 2026. After this date, and as stated by the BACB, Ontario residents will no longer be able to apply for BACB certification.

## 5) WHOSE DECISION WAS IT TO PHASE OUT BACB CERTIFICATION IN ONTARIO? DID ONTABA™ PARTICIPATE IN THE DECISION?

- BACB Board of Directors made the decision in response to the new Ontario regulations
- ONTABA™ did not participate in the decision—was simply informed of the decision
- According to the BACB, the new Act was reviewed and based on legal implications (i.e., title protection, scope of practice) the decision was made

## 6) IS THERE ANY WAY ONTABA™ CAN GET THE BACB TO CHANGE ITS MIND?

- Initially, Executive of ONTABA™ met with the BACB
- Later, President of ONTABA™ called the CEO of the BACB
- BACB confirmed that this a final decision
- Not a decision that the BACB made casually

## 7) CAN THE BACB WORK WITH CPO?

- Both have been working together since the HPRAC report
- The Act, particularly title protection and scope of practice, is the major factor in the decision making here
- RHPA colleges are self-governed
- CPO has no control of future changes made to BACB requirements which impedes self-governance

## 8) WHY NOT REGULATE OTHER TIERS OF PRACTITIONERS THAT WORK IN ABA?

- 2018 HPRAC report determined the direction of regulation
- Historically ONTABA™ recommended tiers
- Summer 2023 ONTABA™ recommended acknowledging tiered service delivery within the CPO Standards that are being developed
- Fall 2023 ongoing discussions with CPO of how to integrate tiered service delivery into the standards
- Keep in mind regulation evolves over time, but it is unusual to regulate roles that do not practice autonomously

A tiered system of delivery for services is still possible in Ontario. For more clarification on this please visit the College's [FAQ](#).

## 9) WAS THE PUBLIC CONSULTED WITH RESPECT TO THE PROCESS TOWARD REGULATION OF BEHAVIOR ANALYSTS?

- [College's Applied Behaviour Analysis Consultation Regulation Amendments \(October 2022\)](#)
  - [To prepare for proclamation for the Psychology Applied Behaviour Analysis Act, 2021](#)
  - CPO and ONTABA™ disseminated call for feedback
  - Call for feedback was open from October 3-December 2 2022
  - Summary of feedback and decisions can be found on the CPO website under CPO Council Agenda & Minutes, Dec 2022
  - Was available to public as of January 30, 2023
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## 10) WHAT HAPPENS TO OTHERS (BCABA, RBT) WHO WILL LOSE THEIR TITLES ASSOCIATED? WHAT ARE THE ALTERNATIVES?

- BCaBAs and RBTs currently work under the supervision of a BCBA. This will not change with regulation. The change is the certification status (BCaBA or RBT)
- Ontario has excellent ABA training programs (e.g., BST, ABAS, BBS) which can be recognized as educational qualifications
- ONTABA™, CPO, MCCSS, and other stakeholders are committed to protecting capacity and building on it

## 11) HOW WILL IT WORK IF SOMEONE FROM ANOTHER PROVINCE OR COUNTRY MOVES HERE? (MOBILITY CONSIDERATIONS)?

- Mobility across jurisdictions is a required component of regulation, and will be included within the registration process
- CPO has articulated that this process is still being developed

- Pathway for considering education from other countries is expected of the Health Colleges

**12) WHAT WILL BE THE IMPACT ON JOBS FOR PROFESSIONALS WORKING UNDER THE BCBA/BCBA-D/SOON TO BE REGULATED BEHAVIOUR ANALYST? WHAT WILL HAPPEN TO TIERED SERVICE DELIVERY?**

- “...those who have been historically certified as a BCaBA or RBT will be able to continue to work in the field under the supervision of a registrant of the College.” CPO, October 2, 2023
- CPO is working on the Standards of Practice for Behaviour Analysts
- ONTABA™ has encouraged CPO to acknowledge the tiered service model in those Standards

**13) WHAT ARE THE TRANSITIONAL ROUTES FOR CERTIFICATION?**

- Information on the transitional routes for certification can be found here: <https://cpo.on.ca/aba/will-i-need-to-apply/>

**14) HOW WERE THE TRANSITIONAL ROUTES FOR CERTIFICATION DECIDED?**

- Typically, regulated professions to have a transitional period to minimize impact on the public, and include current providers
- The CPO may have
  - Considered other transitional processes
  - Consulted Subject Matter Experts
- The draft transitional routes were sent out for public consultation then refined

**15) WHAT WILL THE ROLE OF ONTABA™ BE POST REGULATION (AFTER JULY 1, 2024)?**

- ONTABA™’s intention is to continue to focus on ABA (no plan merge with other professional associations, e.g., OPA)
- CPO (Regulatory Body) provides oversight, sets standards, maintains the public register, etc.



- ONTABA™ (Professional Association) provides leadership, education, advocacy, and support for the profession
- We need both!

**16) WHAT TRAINING SUPPORTS WILL ONTABA™ OFFER FOR REGULATION?**

- ONTABA™ will be releasing jurisprudence and ethics modules that professionals may wish to use as a study guide to support understanding. Jurisprudence and ethics resources are also available here: <https://training.ontaba.org/resources/>

**17) WILL ONTABA™ MAINTAIN THEIR ACE PROVIDER STATUS AND CONTINUE TO ISSUE CEUs FOR THOSE REGISTERED WITH THE BACB?**

- ONTABA™ is committed to continuing to provide CEUs for BACB certification as long as it can qualify to do so.