

8/24/2016

Chairman Oscarson and committee members,

I am extremely grateful and applaud all of the committee's recommendations to improve access for those with autism. I believe they will make a difference.

However, I did receive some concern and was asked if there could be some language changes to insure clarification on number 17.

Our goal is to improve collaboration and access. Access, which will when combined with the student's Free Appropriate Public Education (FAPE) and medically necessary levels of treatment, will ameliorate autism symptoms. We do not want to do anything to cause harm with the current access to ABA. Only to remove barriers which impede access to care. The purpose is not to lessen the schools or the insurance's responsibility.

Please see minor recommended changes. Thank you for your consideration.

17. Collaboration Between School and Out-of-School ABA Services

—Send a letter to the Superintendent of Public Instruction urging Nevada's Department of Education to develop a clear and consistent State policy, with guidance to school districts, for students with an Individualized Education Program (IEP) who require Applied Behavior Analysis (ABA) therapy. In developing the policy, the Department should consider:

- a. Whether an IEP should be required to specify the number of weekly ABA hours needed by the student, with a distinction between the hours to be provided in school and out of school;
- b. Specifying the credentials required of an ABA professional who assists in determining the total weekly ABA hours needed by the student;
- c. Require **collaboration** for ABA services ~~provided in school and out of school be coordinated to~~ maximize their effectiveness and to ensure continuity of service across environments;
- d. Require, **the school to support access to ABA by endorsing the following or similar language to be included in the IEP. if out of school ABA services are deemed necessary for a student, that the IEP specify the number of required hours as an educational goal so that the student is not considered truant while receiving those services; "The IEP recognizes the student's need to receive medical necessary treatment, which may impact full-time school attendance. An adjusted schedule is supported to allow student to receive treatment. Treatment, which may occur in and/or outside of the school environment without incurring truancy."**
- e. Requiring the school to encourage a parent, through written communication from the school, to invite the student's outside ABA professional(s) to participate in relevant IEP meetings;
- f. Allowing a student's out-of-school **ABA Professional** (i.e. BCBA's, **Licensed Psychologists**) (who **is** are funded by private insurance, Medicaid, or ATAP and who passes appropriate background checks) to observe the student in the school environment quarterly and/or allowing such a provider to support the student during the school day if the student's behavior impedes learning or if the student's history includes elopement, suspension, or aggression.

All professionals (Psychologists, BCBA's, BCaBA's, RBT's) who treat autism and are funded by private insurance, Medicaid or ATAP are currently required to pass background checks as part of the credentialing process.

With hope and gratitude,
Jan Crandy

