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Public Statement to the Board of Applied Behavior Analysis

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Hello.

My comment today is about the long delays we are experiencing in the credentialing process, especially of our RBTs. We are aware that the pandemic has presented challenges. And, the ongoing delays are taking a significant toll on our ability to provide services to our current clients, let alone develop a large enough workforce to address the many underserved children in our community.

While there are multiple entities involved in credentialing for behavioral providers, here I would like to address a specific component. The provision of background check instructions is directly under the control of the board and ADSD and the timing of this step significantly impacts the total duration of the credentialing process.

To share some data from our organization:

- Since June, we have hired 16 BTs who required full credentialing. Of those, the average number of days between submitting their application and receiving their background check instructions is 22 days with a range of 7 days to 69 days and a median of 16 days.
 - We have two employees who did not receive their background check instructions for over 60 days, both for applications submitted in November.

We appreciate that the board and ADSD allows applicants to initiate background checks without a completed application in order to expedite the process. However, delays by ADSD in sending the information are exacerbating delays created by other entities. For instance, we have an employee that met all requirements in September, but a long delay in ADSD processing his application and sending background check information coupled with a long delay in DPS processing his background check, means that he still does not have a state credential.

The rationale for moving the licensure of behavior analysts out of the Board of Psychological Examiners was to reduce barriers to access for consumers - children with autism whose long-term outcomes are dependent upon early and effective

intervention. Instead, we are experiencing longer delays to credentialing than before, which in turn, is having a negative impact on our clients:

- At least half of our hires have had to take on second jobs in order to sustain themselves financially while waiting for their credentials. This has resulted in reduced availability that has negatively impacted our clients' access services.
- We have 5 clients who we initiated intake with anticipating that we would have the credentialed staff, only to be waiting *over 6 months in some cases* for credentialing.

I am requesting that the members of the Board

1. Investigate why there are often long delays in providing fingerprinting instructions for new applicants and address the contributing factors.
2. Contact DPS to determine if there are solutions to be had in processing background checks more quickly.
3. Consider taking steps to offer provisional registration while RBTs await their background check results in order to allow access to services more quickly.
4. Complete an internal audit and, provide publicly, data about the performance of the board and ADSD in processing applications (e.g., monthly number of initial applications processed, days to sending background check emails, days to receive background check results, days to process completed applications, number of applications approved).

Again, we can empathize with the challenges of operating an organization during the pandemic - we have been doing it ourselves for a year now. But it is time to address the aspects of the credentialing process that the board and ADSD *can* control.

Thank you