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To Whom It May Concern,

As a BCBA/LBA and ABA business owner in Nevada, we have found the registration process for Registered Behavior Technicians (RBTs) to be flawed and imposes barriers to practicing ABA in Nevada. Due to long wait times, it is taking an average of 60 days (or longer) for RBTs to be registered with the state from just the date of fingerprint submission. This does not account for the additional time (sometimes in excess of two weeks) that it is taking for RBT applications to be approved for fingerprinting to be done. This delay creates several barriers for RBT staff and providers in regards to servicing individuals waiting for ABA therapy in a timely manner.

Nevada is an underserved area for ABA. According to RAD, it is estimated that there are approximately 8,500 school-aged children diagnosed with Autism in Nevada (most of which are in Las Vegas). Our current waiting list has approximately 56 children waiting for services, which can mean potential wait times of up to 1-2 years before they may begin receiving services with us. We current employ 16 RBTs, 5 BCBAs, and 1 BCaBA. With such long wait times, it is critical for us and other ABA companies to be able to hire and start RBTs within a reasonable amount of time to decrease the number of days that potential clients are waiting to access services. As you know, RBTs need no more than a high school education; therefore, waiting for a registration to be approved for upwards of 60 days is unrealistic in terms of employment for them. Most cannot wait for such a long period of time to start employment and will seek other employment in the mean time. This interferes with their availability and ability to work full time as an RBT to service our children.

I have provided some "raw data" below regarding the delays in the registration and licensure process with the state of Nevada.

Employee 1:

Fingerprints were done 9/14/20; registration was approved 11/19/20. Contacted the board on 10/15/20, 10/28/20, 11/6/20, 11/9/20, 11/13/20 for status updates. Typical response time to contacts was approximately 3-4 days; however, little to no information on the status was provided. (66 days to process after fingerprinting)

Employee 2:

Fingerprints were done 12/23/20; registration was approved 2/17/21. Contacted the board on 1/26/21; received a response on 1/29/21. Contacted them again on 2/10/21; received a response on 2/16/21. Typical response time was approximately 3-6 days. (56 days to process after fingerprinting)

Employee 3:

Application was completed 1/10/21. Application was not approved until 1/29/21. Fingerprints were done 2/1/21. Still pending/processing. (41 days total thus far)

Employee 4:

This was for a BCBA license renewal. Everything was received 11/16/20. Check cashed 11/20/20. BCBA did not receive her license renewal until 12/31/20 (expiration date and 41 days later). Other BCBA's in the same bunch received theirs weeks earlier (applications were all sent together). BCBA emailed the board on 12/9, 12/11, & 12/16. Inquiry on 12/16 was not responded to until 12/21 (5 days). I personally emailed the board on 12/7/20 for a status update and never received a response.

In all instances, several emails were sent for status updates. Most took several days to receive a response. Although we understand that this process is in place to provide a higher standard of professionalism within our field and an added level of accountability, the process needs to be refined in order to alleviate the hurdles of servicing children with ASD in this state and increasing the number of RBTs in our underserved field. Please know we are here to help; however, we first need to collectively identify that there is a problem and then propose a reasonable solution before we can start working as a team to better rectify this process.

Kind Regards,



Samantha Lemons; BCBA, LBA