BCBA and BCaBA Pathway 2 Coursework Attestations FAQs

(Effective January 1, 2026)

On January 1, 2026, the Verified Course Sequence (VCS) system of the Association for Behavior Analysis International (ABAI) was discontinued.

Universities may continue offering behavior-analytic coursework for individuals pursuing BCBA or BCaBA certification under Pathway 2 if the following criteria are met:

- The coursework fully complies with the Pathway 2 behavior-analytic coursework eligibility requirements for BCBA or BCaBA certification.
- The university employs a full-time faculty member in the department where the program is housed who holds an active BCBA or BCBA-D certification and who:
  - reviews each student's coursework to ensure it meets all current Pathway 2 behavior-analytic coursework requirements.
  - completes an attestation for each eligible applicant and follows the instructions on the Pathway 2 Coursework Attestation form for submission.

Frequently Asked Questions

Q. How do I know whether the applicant met the coursework requirements?

- First, review the BACB's current Pathway 2 behavior-analytic coursework requirements, which are located in the BCBA and BCaBA Handbooks. Review the student's transcript to ensure that each course is listed and that the student took each course for credit and passed. Next, review the course materials (e.g., syllabi) for each course. Determine whether the courses were taken within 10 years, how many relevant content hours were taught in each area, and whether the requirements were met across all of the courses taken.

Q. Can I just review a few courses and agree that the applicant met parts of the requirements (e.g., I agree that they met the Behavior Assessment content requirement)?

- No. We only accept attestations in which the Pathway 2 Program Contact has reviewed all of the applicant's materials to confirm that the applicant accrued enough hours in *all* of the required content areas.

Q. What if the applicant completed some behavior-analytic courses that are not part of our program?

- If you have access to the course syllabi/materials and transcript(s), you may include those courses in the attestation.

Q. If the applicant did not complete any courses from my program, can I review their materials and sign the attestation?

- No.

Q. Without the VCS Directory or VCS emblem, how can I indicate to potential students that we offer a course sequence that meets the BACB's Pathway 2 coursework requirements?

- If the coursework meets all of the Pathway 2 behavior-analytic coursework requirements, you may include the following statement on your website, "Our program meets the behavior-analytic coursework requirements for those pursuing the [BCBA/BCaBA] Pathway 2 eligibility route."

Q. How will university pass-rate data be handled under the new Pathway 2 coursework attestation system?

- When the Pathway 2 Program Contact submits the attestation for a student, they will indicate whether the student completed all of the coursework in one program or whether the coursework was completed across multiple institutions or programs. If the student completed all of their coursework in one program, the Pathway 2 Program Contact will indicate which program the student completed (e.g., their online behavior analysis program). If the applicant completed all of their coursework in one program, their data will be included in the program's pass-rate data. If the applicant completed mixed coursework at multiple institutions or in multiple programs at the same institution, their data will not be included in the program's pass-rate data.

Q. Does the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) prohibit me from submitting the attestation to the BACB?

- No. Colleges and universities commonly provide student information to certification and regulatory bodies upon request from a student, so they typically have existing protocols for the release of student information to a third party. If you have not already developed a FERPA release, you may ask your institution's registrar about existing protocols. If your institution does not have such protocols, you may have your students sign a written FERPA release authorizing the disclosure of information to the BACB. FERPA requires that consent for disclosure of educational records be signed and dated, specify the information that may be disclosed, state the purpose of the disclosure, and identify the party or class of parties to whom the disclosure may be made (34 CFR § 99.30). Your release should also include the educational records (e.g., transcripts) you review to complete the attestation.

Q. Can I sign the attestation if I am not an active BCBA?

- No. Only active, BCBA-certified full-time faculty who have completed the Pathway 2 Program Contact request process and been approved may sign Pathway 2 Coursework Attestations. Signers must also adhere to the BACB Ethics Code for Behavior Analysts.

Q. I have an adjunct faculty status at my university. Can I be the Pathway 2 Program Contact?

- No. The Pathway 2 Program Contact must be a full-time faculty member in the department offering the program. If the program does not have a full-time faculty member, we recommend that staffing changes or program accreditation plans begin as soon as possible.

Q. Can another faculty member cosign the attestation?

- No. Only one faculty member from the program can attest that the applicant met the coursework requirements.

Q. What if my program is discontinuing, or has already been discontinued, and does not have a full-time faculty member?

- Use the University Faculty Contact Form to request more information about your situation.

Q. Can the BACB review our program or coursework to ensure it meets the BACB's coursework requirements?

- No. For this reason, the BACB requires an approved Pathway 2 Program Contact who meets specific qualifications. As a certification board, the BACB is not permitted under its National Commission for Certifying Agencies (NCCA) accreditation to be involved in training or coursework review. NCCA standards require a firewall between the certification program and the academic programs that train individuals pursuing certification.

Q. I was the VCS Coordinator for our program prior to the sunsetting of the VCS system. Do I still need to complete the Pathway 2 Program Contact request?

- Yes. Each program must be reviewed and approved before the Pathway 2 Program Contact submits any Pathway 2 Coursework Attestations, regardless of previous VCS Coordinator status.

Q. Once I have submitted a Pathway 2 Coursework Attestation, is there further action required from me as the Pathway 2 Program Contact?

- It depends. At the time the student applies, if any information on the Pathway 2 Coursework Attestation is inconsistent with the supporting application materials, you may be asked to correct the attestation.

Q. I have submitted a Pathway 2 Coursework Attestation, but my student's application keeps getting denied. What are some common reasons why Pathway 2 Coursework Attestations are not approved?

- There are several reasons why a Pathway 2 Coursework Attestation may not be approved, even if you are an approved Pathway 2 Program Contact. Below are a few key items to keep in mind when completing the attestation:
  - The program name on the Pathway 2 Coursework Attestation must match the program name approved on the Pathway 2 Program Contact Request Form. If the institution has multiple programs, a separate request must be submitted for each program.
  - If any portion of the Pathway 2 Coursework Attestation is incomplete, it will not be accepted.

2027 Coursework Attestation FAQs

Q. What if the courses my students completed are not freestanding? Can I still attest to the 2027 coursework requirements?

- To meet the 2027 BCBA/BCaBA Pathway 2 behavior-analytic coursework requirements, the coursework must satisfy all applicable 2027 coursework requirements. However, supplemental content may be included in a course as long as the majority of the course content covers the applicable content area.

Q. If a student completed the 2027 BCBA Pathway 2 behavior-analytic coursework requirements, can I submit an attestation so they can apply for BCaBA certification?

- While graduate-level coursework may apply toward a BCaBA application, the coursework attestation must be completed on the applicable form to confirm that the coursework requirements have been met. If a student is applying for BCaBA certification, they must have a BCaBA coursework attestation on record confirming that the BCaBA coursework requirements have been met. A BCBA coursework attestation can only be used for a BCBA certification application. If a student plans to apply for both BCBA certification and BCaBA certification, two coursework attestation forms must be completed to confirm that the coursework requirements for both certification levels have been met.

Q. Do the 2022 coursework requirements meet the 2027 coursework requirements?

- It depends. If the coursework covered the required content and the courses met the freestanding requirements, it may meet the 2027 coursework requirements.

Q. If I submitted a 2022 coursework attestation and have confirmed it meets the 2027 coursework requirements, can it be used for a 2027 certification application, or do I need to submit a new 2027 coursework attestation?

- No. A 2027 Pathway 2 Coursework Attestation must be submitted with a 2027 Pathway 2 certification application. Likewise, a 2027 Pathway 2 Coursework Attestation cannot be applied toward a 2022 Pathway 2 certification application.

Q. How can I tell which version of an attestation I submitted?

- In the Pathway 2 Program Contact's BACB portal account, the 2022 and 2027 tabs list the attestations completed for each requirement type.