

BACB Newsletter



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Announcing Changes to BCaBA (5th ed.) Examination Specifications

To ensure that BACB examinations keep pace with changes in the applied behavior analysis (ABA) profession, their content periodically goes through a rigorous review and a data-driven update process. In February and September 2019, BACB staff facilitated BCBA/BCaBA Task List (5th ed.) reviews with subject matter experts (SMEs) from the BCaBA Item-Writing Committee to (a) confirm that BCBA and BCaBA certifications are different enough to warrant separate task lists and (b) identify elements from the BCBA/BCaBA Task List (5th ed.) that are not relevant enough to entry-level BCaBAs to appear on the BCaBA examination (*the primary purpose of a task list*). After the discussions, the SME committee identified 4 task list elements out of the 95 total elements reviewed to be removed from the existing BCBA/BCaBA Task List (5th ed.). The BACB’s Board of Directors voted to accept the SME committee recommendations on October 21, 2019.

SME Meeting Composition

The February 27–28, 2019, SME panel (n=19) comprised 10 BCaBAs, eight CBAs, and one BCBA-D. All SMEs who participated in the meeting had a role as a practicing BCaBA, previously practiced as a BCaBA, or currently supervised the practice of BCaBAs. In addition, the SMEs varied in their years of experience and geographical locations. The September 23–24, 2019, SME panel comprised the same members with two exceptions: Two BCaBA SMEs were unable to participate, so two new BCaBA SMEs were recruited to serve as replacements.

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Overview of Changes

The following items will be removed from the BCaBA Task List (5th ed.). These changes are minor and should not impact university coursework for BCaBA certification because the primary sections and topics have not changed. The specific tasks that were removed are shown here to provide perspective on the scope of the changes. The removal of these four tasks should only be viewed through the lens of their relevance to the testing of entry-level BCaBAs and not as an indication of their lack of importance or relevance to the practice of BCaBAs.

Tasks to be Removed (**orange and bolded elements**):

F. Behavior Assessment

F8: Conduct a functional analysis of problem behavior

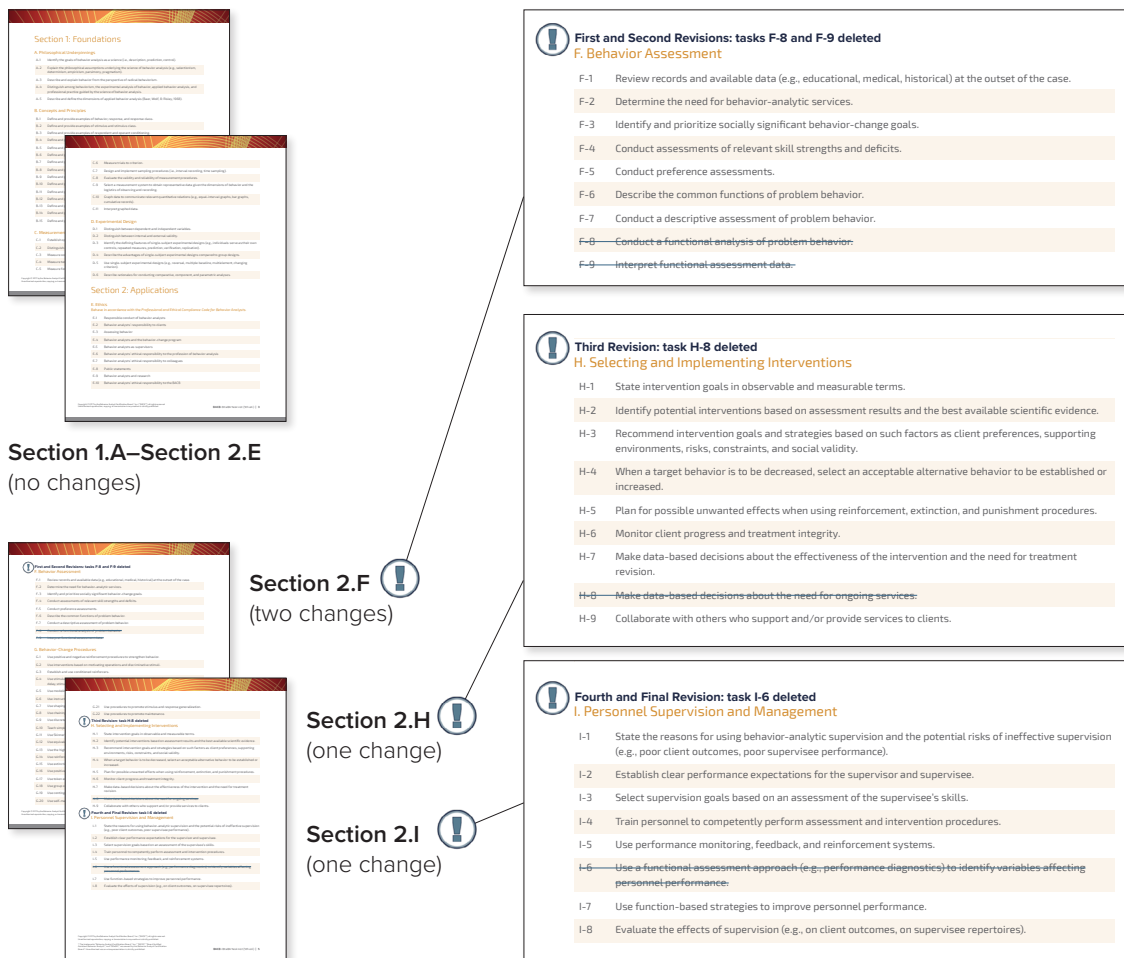
F9: Interpret functional assessment data.

H. Selecting and Implementing Interventions

H8: Make data-based decisions about the need for ongoing services.

I. Personnel Supervision and Management

I6: Use a functional assessment approach (e.g., performance diagnostics) to identify variables affecting personnel performance.



These changes have resulted in two new documents: the [BCaBA Task List \(5th ed.\)](#) and the [BCBA Task List \(5th ed.\)](#), both of which are now available on the BACB website. Moving forward, the BACB will update the BCBA and BCaBA task lists using independent processes.

Determining Whether it is Appropriate to Conduct a Standardized Assessment: The Example of the Vineland Adaptive Behavior Scales

The BACB periodically receives inquiries about whether it is appropriate for a BCBA or BCaBA to conduct a specific standardized assessment. However, asking whether a behavior analyst may administer a specific assessment instrument is a misleading question. The more appropriate question to ask is: “How does a behavior analyst determine if they may administer a specific assessment?” Consider, for example, the Vineland Adaptive Behavior Scales (Vineland)¹.

The Vineland, like other standardized assessments, has a variety of functions, including supporting a diagnosis, measuring current performance, measuring the change in performance over time, informing treatment planning, and informing intervention design. For example, the publisher of the Vineland states: “Vineland-3 not only aids in diagnosis, but provides valuable information for developing educational and treatment plans.” (Retrieved July 17, 2020, from pearsonassessments.com)

Behavior analysts are often responsible for assessing behavior, identifying areas for improvement, and designing and implementing interventions to address identified goals. These activities are seemingly consistent with the publisher’s stated functions of the Vineland. When deciding if a behavior analyst *should* use an assessment, they should first determine if using it is appropriate for behavior-analytic practices in assessing behavior.

Before conducting an assessment, a behavior analyst must engage in a critical analysis that includes a consideration of whether implementing an assessment is within the scope of practice for behavior analysts, as related to the [BCBA](#) and [BCaBA](#) Task Lists (5th ed.) and the [Professional and Ethical Compliance Code for Behavior Analysts \(Code\)](#). Although the primary function of the task list is to convey the scope of an examination’s content, it is based on a Job Task Analysis of the profession. Thus, the task list serves as an important source of information about behavior-analytic practice. Specific task-list items related to assessment activities include:

- E-3 Assessing Behavior
- E-4 Behavior analysts and the behavior-change program
- F-2 Determine the need for behavior-analytic services
- F-3 Identify and prioritize socially significant behavior-change goals
- F-4 Conduct assessments of relevant skill strengths and deficits
- H-2 Identify potential interventions based on assessment results and the best available scientific evidence
- H-8 Make data-based decisions about the need for ongoing services

It may be appropriate for a BCBA or BCaBA to conduct the Vineland for the purposes mentioned earlier. However, it is important to note that the BCBA and BCaBA Task Lists do not include diagnostic activity because the SMEs who informed those task lists and the certificants who participated in the Job Task Analysis did not include such activity in the tasks generally performed by behavior analysts. In addition, US behavior analyst licensure laws often have the same exclusion in their scopes of practice. Thus, conducting the Vineland to support a client diagnosis would be considered practicing outside of the scope of practice of a behavior analyst.

¹Vineland Adaptive Behavior Scales (Third Edition) is published by Pearson Assessments. The BACB is not affiliated with the Vineland or Pearson Assessments. The Vineland is used in this article as an example of a typical standardized assessment that may be performed by a behavior analyst under certain circumstances.

In addition to determining whether an assessment is within the scope of practice for behavior analysts, it is important to determine one's competence in conducting the assessment. Professional competence is highlighted throughout the Code, including element 1.02, which states:

- (a) All behavior analysts provide services, teach, and conduct research only within the boundaries of their competence, defined as being commensurate with their education, training, and supervised experience.
- (b) Behavior analysts provide services, teach, or conduct research in new areas (e.g., populations, techniques, behaviors) only after first undertaking appropriate study, training, supervision, and/or consultation from persons who are competent in those areas.

In addition, 3.01(a) of the Code states:

Behavior Analysts conduct current assessments prior to making recommendations or developing behavior-change programs. The type of assessment used is determined by the client's needs and consent, environmental parameters, and other contextual variables. When behavior analysts are developing a behavior-reduction program, they must first conduct a functional assessment.

Finally, 4.03 of the Code states:

Behavior analysts must tailor behavior-change programs to the unique behaviors, environmental variables, assessment results, and goals of each client.

In conclusion, conducting the Vineland assessment may be appropriate for some BCBA's and BCaBA's if: 1) the assessment is being used in a way intended by the publisher, 2) the intended use is within the scope of practice for behavior analysts, 3) the BCBA or BCaBA is competent to implement the assessment, and 4) all of the publisher's requirements for implementing the assessment have been met. The critical take-home point is that, before conducting an assessment, the BCBA or BCaBA should engage in this decision-making process.

Taking Supervision Seriously

There are three types of supervision within the BACB's certification requirements: ongoing supervision of RBTs, ongoing supervision of BCaBAs, and supervision of trainees who are fulfilling BCBA or BCaBA experience and fieldwork requirements. Providing quality supervision in each of these roles serves a crucial function for clients, supervisees and trainees, and the ABA profession as a whole. As a result, subject matter experts have established well-defined requirements for supervisors and their practices in each supervision area. Because the BACB understands that supervision is a complex undertaking, we want to highlight a few of the most common supervision issues and concerns related to supervisory volume.

Common Supervision Issues

- **Noncompliance with the relevant supervision or experience/fieldwork requirements.** Some supervisors do not ensure that their supervision is meeting all relevant BACB requirements. For example, we have identified these scenarios:

- The supervisee (i.e., RBT, BCaBA)/trainee is not being supervised by a qualified supervisor.
- The supervisee/trainee is not receiving enough supervision during each supervision period.
- There is a multiple relationship between the supervisor and supervisee.
- There are no systems in place to document and maintain evidence of supervision.

In addition to being potentially detrimental to service delivery, failing to meet supervision requirements can have serious negative outcomes for the supervisee/trainee, such as trainees having experience hours disqualified, BCaBAs losing their certification, and RBTs losing their certification with a mandatory six-month period before they can apply for certification again. The BACB has filed Notices of Alleged Violation against supervisors when they are not providing supervision in accordance with the requirements, and some supervisors have received coaching or other disciplinary consequences (see [Code-Enforcement Procedures](#)). We strongly encourage supervisors to review relevant supervision requirements with their supervisee/trainee throughout the supervision relationship to ensure that they are continually meeting the requirements.

- **Not actively managing RBT and BCaBA supervisees on record with the BACB.** Those who hold RBT or BCaBA certification are not permitted to provide behavior-analytic services without ongoing oversight of their work by a qualified behavior analyst supervisor. It is critical that RBTs and BCaBAs have their supervisor(s) and/or RBT Requirements Coordinator(s) on record with the BACB. Doing so allows supervisors and RBT Requirements Coordinators to be published in the Certificant Registry, indicating that the RBT's or BCaBA's certification is active, that they may represent themselves as certified, and that they may provide ABA services. We regularly encounter two common and concerning situations:
- The BCBA/RBT Supervisor or RBT Requirements Coordinator did not add themselves to the supervisee's record, rendering the supervisee's certification inactive. However, the supervisee was nevertheless providing and billing for services.
- The RBT/BCaBA Supervisor or RBT Requirements Coordinator did not remove themselves from the supervisee's record when they were no longer acting in such a role. In these situations, the public would falsely assume that the RBT or BCaBA can provide ABA services, even though they are not receiving supervision or oversight (and thus have an inactive certification).

In addition to being noncompliant with BACB requirements, the scenarios just described have resulted in substantial billing problems and have jeopardized the parties' BACB certifications. If you are supervising RBTs and/or BCaBAs, ensure that you are managing that relationship in your BACB account. If you are an RBT Requirements Coordinator, you *must* be on record with the BACB for each RBT that you oversee. If you are an RBT Supervisor or BCaBA Supervisor, you do not necessarily need to be on record for all of your supervisees, as long as one of their RBT/BCaBA Supervisors or the RBT Requirements Coordinator is on record. However, we strongly recommend that *all* supervisors are on record.

- **Lack of communication between the supervisor and supervisee/trainee.** In some cases, clear communication is lacking around critical factors, such as: 1) the supervisor's role at the beginning of the relationship (keep in mind that there are allowances for various supervision structures such as Requirements Coordinators for RBTs or multiple supervisors at one organization for trainees), 2) expectations and performance feedback (see 5.0 of the Code), and 3) steps to transition supervision when the relationship ends. Similarly, there may be disagreements about whether a supervisor will sign a trainee's Experience or Fieldwork Verification Form or what service hours require supervision. We highly recommend that supervisors set clear expectations, delineate roles, and provide immediate feedback throughout the supervision experience. Thus, we recommend ensuring that your employment/supervision contracts, policies, and procedures provide clear expectations regarding supervision.

Supervision Volume

Although there are many reasons why the issues listed earlier occur, one situation we commonly encounter is supervisors with a high number of supervisees (typically RBT supervisees). We are periodically asked to provide supervisors with a specific number or range of allowable supervisees/trainees. However, given the breadth of ABA practice areas and settings, an explicit upper limit is not feasible. That said, the number of supervisees/trainees that any given supervisor can *effectively* supervise is directly dependent on several factors that vary based on each supervisor and their context at any given time. Some of these factors include:

- supervisor's experience level and workload
- number of available supervisors
- number of hours the supervisee/trainee is working
- setting (e.g., clinic-based vs. in-home)

These factors can exist in a variety of combinations and can shift at any time for a supervisor. That is why 5.02 of the Code uses a functional definition related to *effectiveness*, instead of specifying a set number. Here is an example of RBT supervision that might help illustrate the individual differences involved in determining appropriate supervisory volume:


RBT Supervision Requirement¹: 5% of behavior-analytic service hours each calendar month must be supervised; at least one of the supervision meetings must be an individual meeting.

RBT Supervision Example²: In this scenario, each full-time RBT is providing 30 hours per week of behavior-analytic services (120 hours per month), and the supervisor is working 40 hours per week (160 hours per month). The supervisor would need to provide a minimum of six hours of supervision in that month (5 percent of 120 hours). Let's further assume that the supervisor breaks down the RBT's supervision into four hours of individual meetings and two hours of small-group meetings across the month. In this example, the maximum number of full-time RBTs the supervisor could have is 38. However, that would require the supervisor to spend *all* 40 hours per week providing supervision, leaving no hours for transitioning between RBTs or all the other tasks they have to accomplish.

It may be the case that some supervisors exclusively provide RBT supervision; however, more often than not, supervisors have other work requirements. For example, behavior analysts are likely responsible for conducting assessments, reviewing data, designing and updating intervention programs, training staff, meeting with caregivers and other stakeholders, writing reports, managing their schedule, and tracking their work hours and activities. Given the example provided, there would be no time for these activities. If a supervisor were responsible for 30 full-time RBTs, that would leave 10 hours a week for non-RBT activities, which is not much time for such important and varied tasks. A caseload of 20 full-time RBTs would leave the supervisor with 20 hours per week remaining for other work tasks, which is perhaps a more reasonable scenario.

¹See the Ongoing Supervision section of the [RBT Handbook](#) for a full description of the requirements.

²In this example, we use a four-week month for simplicity.



In addition to the number of available hours to complete supervision and other work requirements, supervisors need to consider the relevant characteristics of their workplace. Some characteristics might allow a supervisor to be effective with a slightly larger supervisee caseload. Factors that might facilitate a slightly larger supervisee caseload include: all services are provided at a clinic, remote supervision is available, clients having similar service needs, RBTs having similar support needs, the supervisor having several years of experience with service delivery and supervision, the supervisor having a fairly small client caseload, the supervisor having minimal work requirements unrelated to supervision, or the supervisor working in a setting with significant supports (e.g., electronic data collection; staff who take care of scheduling, billing, interviewing, and training).

The converse of those same characteristics could be barriers to providing effective supervision to large numbers of supervisees. For example, consider a supervisor who was only recently trained and certified. The supervisor is likely to struggle with providing effective supervision to a large number of supervisees. If the services the supervisor provides are primarily in-home with large distances between appointments, they have a large caseload of clients with very different service needs, and they have numerous other duties (e.g., hiring and onboarding, scheduling for their staff), in some cases, the math just will not work out.

Ultimately, it is up to each supervisor to carefully consider not only the math, but also the relevant factors and characteristics of their workplace in determining the appropriate number of supervisees they can effectively manage. The number of supervisees allowing for *effective* supervision that meets the BACB's requirements is unique to a supervisor's specific scenario at any given time.

We hope this information provides clarification on common supervisory issues and ideas for how to avoid them. The examples of supervisory volume show that it is impossible to provide a set number or range of supervisees. These examples also show that the supervisor is better able to determine when they are most likely able to be *effective*. To all supervisors—we thank you for your work to help ensure consumer protection and facilitate quality services being obtained from our profession.

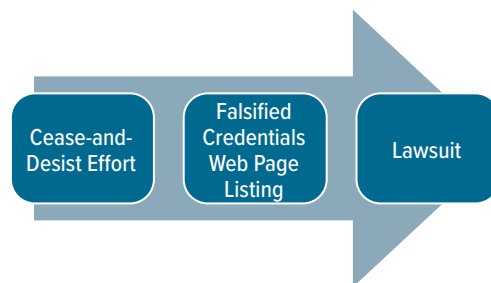
RBTs Must Know Their BACB Account Details

RBT applicants are individually responsible for *creating* and *maintaining* their accounts with the BACB. Supervisors or organization representatives should not do either of these activities on behalf of an RBT applicant or RBT. In many cases, RBTs are creating new BACB accounts in an attempt to apply or renew their certification when they do not have accurate login information to access their existing accounts, which were created by third parties. This issue will result in processing delays while the BACB verifies their information and manually merges multiple accounts. If you are an RBT and do not have your login information, please let us know by using the [Contact Us Form](#) on our website rather than creating another BACB account.

Protecting Yourself Against Professional Identity Theft

We provided guidance on protecting your certification and NPI numbers in the [August 2019 issue of BACB Newsletter](#). Unfortunately, we are still encountering instances of identify theft and situations in which certification numbers are being fraudulently used. In these situations, multiple parties need to take action. For example, the BACB conducts a rigorous cease-and-desist process when we have contact information for individuals who are known to be misrepresenting themselves as BACB certified and/or who are using others' certification numbers (typically in fraudulent billing). When we do not have contact information for these individuals, or when they have disregarded cease-and-desist notices, we publish their names on our [Falsified Credentials](#) web page. This web page is a resource for our certificants, consumers, funders, and regulators which can be used to confirm certification status. In addition, we also reserve the right to file a complaint in a court of law with jurisdiction over the matter, should the BACB have sufficient information to proceed against an infringer.

The BACB's Efforts.



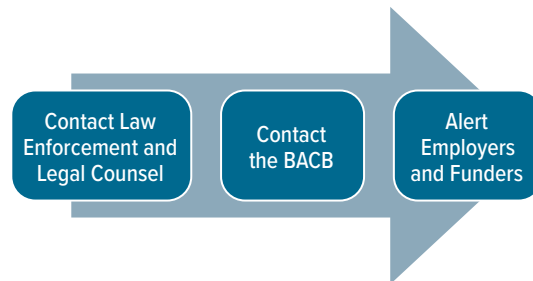
We strongly encourage you to be diligent in protecting your professional identity. Consider, for example, the [Federal Trade Commission's Warning Signs of Identity Theft](#). The theft of your credential may not be obvious at first. You may have an insurer contact you about a client who is not on your caseload. You may suddenly discover that you were assigned a new or different NPI number. You may be contacted about websites or social media posts that you did not create. All of these scenarios could be signs that your information has been jeopardized. Do not ignore these unusual occurrences. We will do our part, but it is ultimately up to you to be vigilant about protecting your credentials and reporting misuse when you see it.

In some particularly difficult cases, the BACB's efforts to shut down misrepresentations of certification status may not be sufficient. When your identity, including certification identity, has been misappropriated, it is up to you to take the necessary steps to address the misrepresentation. For example, this may include:

- **Contacting law enforcement**—This option is particularly useful when you know who is misusing your identity/credentials.
- **Seeking legal representation**—An attorney may help you navigate the steps to stop the misrepresentation and mitigate any damage to you because of the misrepresentation.

- **Contacting the BACB**—If you have reason to believe someone is misusing your certification, please contact the BACB immediately via the Contact Us Form at the bottom of the [Falsified Credentials](#) web page.
- **Contacting employers and third-party payers**—Consider consulting with your attorney about how best to inform employers and third-party payers of the misrepresentation.

Your Efforts.



COVID-19 Experience/Fieldwork Reminder

One of the purposes of the BCBA and BCaBA Experience/Fieldwork Requirements is for trainees to develop their behavior-analytic skills *with clients*. For this reason, the requirements specify that a supervisor must *observe trainees with a client* each supervisory period for a specified number of times, depending upon the category of experience/fieldwork being obtained.

Due to the COVID-19 pandemic, the BACB made a temporary allowance available for the *observation-with-a-client* requirement. This allowance may be used temporarily when in-person services are prohibited, and telehealth is either not permitted or not available. Although direct service delivery may not occur in these circumstances, other *unrestricted* service activities can still be completed (e.g., training staff or caregivers on behavior-analytic programs or content, analyzing client data, researching literature relevant to a client’s programming). As always, it is important to remember that when completing unrestricted hours, all experience/fieldwork hours need to be connected to specific clients; using analog or role-play activities that are not client related does not qualify.

We will review this temporary allowance in the coming months and communicate any changes, including when the allowance will expire.

Recent and Upcoming Changes to BACB Requirements

The following table summarizes important requirements changes announced in the *BACB Newsletter*.

Effective Date	Area	Change	Newsletter
January 1, 2020	BCBA and BCaBA Maintenance Requirements	Changes to CEU requirements for BCBA and BCaBA certifications.	November 2018
November 1, 2020	RBT Examination	Candidates will have a maximum of eight examination attempts during a one-year authorization period.	November 2019
January 1, 2022	BCBA and BCaBA Coursework Requirements	Changes to the coursework requirements for BCBA (Option 1) and BCaBA credentials.	January 2017
	BCBA and BCaBA Examination Content	All BCBA and BCaBA examinations will be based on the BCBA Task List (5th ed.) and the BCaBA Task List (5th ed.) .	January 2017
	BCBA and BCaBA Experience and Supervision Requirements	Changes to the Structure and Amount of Supervised Fieldwork, Terminology Revisions, BCBA & BCaBA Fieldwork & Supervision Requirements, Appropriate Clients, and Activities.	October 2017
	BCBA and BCaBA Degree Requirements	Changes to the degree requirements for BCBA and BCaBA certifications.	October 2018