

DK notes for 6/29/22 meeting

Look at Neb. Rev. Stat. section 71-6223 (3) and determine if you have submitted all you want to meet subsections (a) through (i). I suspect some of the additional materials submitted need to be formally made part of your application.

The application, and subsequent materials still contain misstatements\* regarding current unregulated practice of ABA and discipline of certified and registered professions. "Certified" and "registered" are terms that have specific meanings under the Uniform Credentialing Act and Nebraska Regulation of Health Professions Act. The national organization may certify, but that is not the term under discussion for a Nebraska Regulation of Health Professions Act review. The Nebraska Regulation of Health Professions Act at section 71-6222, directs the type of credential that should be given.

\*Currently there are no prohibitions on the practice of ABA. This may allow delivery of less than optimal ABA. Applicant presents evidence of barriers for reimbursement/compensation which may, speculatively, increase cost and impact delivery of services.

\*There are legally established processes and dedicated personnel for the discipline of all professions licensed, certified, or registered under the Uniform Credentialing Act.