

Good morning,

My name is Patricia Zematic and I am a licensed Psychologist and a Board Certified Behavior Analyst at the doctoral level. My primary work responsibilities include the assessment of autism spectrum disorders and other related developmental disabilities. I also oversee the supervision requirements of ABA services for children with NE Medicaid insurance.

BCBAs working with NE Medicaid clients are required to meet with me so that I can review and approve treatment plans and treatment plan revisions. I must also observe these clients while they are receiving behavior analytic services. Although I enjoy hearing about these cases and seeing these children in the context of their therapy appointments, this is not an appropriate use of resources, nor is it a necessary component of ensuring that these children continue to receive appropriate care.

The BCBAs that I supervise handle their cases as independent practitioners, just as they have been trained to do. Many go above and beyond the supervision requirements set by the Behavior Analysis Certification Board. Everyone I supervise meets with their implementing technicians in a 1:1 format at least once per month, although many meet more often than this. The BCBAs also spend at least 5% of the time each client is in therapy observing the technicians to ensure a high level of accurate therapy is being carried out.

The degree of oversight that the BCBAs provide ensures that any modifications to therapy are changed and updated regularly and the client continues a path of improvement. In my opinion, I am essentially engaging in these supervision activities just so we can be in compliance with NE Medicaid, not for any actual benefit to the client. In general, I have little to offer or add to the care of these children because the BCBAs are practicing well within their scope of practice, and do not need support to do their job well.

The State of Nebraska has a shortage of mental health providers. Families seeking autism evaluations and autism services face very long waiting lists. We're talking years of waiting. It is a waste of resources to essentially allocate two providers to oversee the provision of the same service for the same clients. This takes away time I could be diagnosing children and connecting them to services. A task that is unique to my credential as a licensed psychologist. This unnecessary duplication in supervision only adds to the already long waiting times these children and their families face.

Providing behavior analytic services in the form of ABA requires specialty training, much like the training individuals who hold the BCBA credential at both the masters and doctoral level possess. My specialty training in ABA was not a required portion of the doctoral program I completed to become a licensed psychologist. Although my program was behaviorally oriented in nature, I completed hundreds of additional hours of behavior analytic training with professionals outside of my degree program just so I could be trained in behavior analysis. Many licensed psychologists do not have the degree of knowledge or training in behavior analysis that even a master's level BCBA possesses. Those who do, often had to seek additional training and supervision experiences outside of their generalist psychology training programs to do so, or they attended psychology training programs that were behaviorally oriented in nature. Even though I attended a behaviorally oriented program, most of my peers would tell you that they have no desire and do not possess the skills necessary to supervise the provision of behavior analytic services. Period.

I worry that the requirement that licensed psychologists/LIMHPs must supervise behavior analytic services for NE Medicaid patients is already disadvantaging our children and families. Although we have seen an increase in ABA providers in recent years, many of those organizations do not have licensed psychologists or LIMHPs available to provide the supervision that NE Medicaid requires. I know this is the case because I get job offers from these organizations on regular basis just on the off chance that I have the time to provide supervision to meet these NE Medicaid requirements. If these organizations, who already have qualified providers (i.e., BCBAs) cannot get LPs or LIMHPs to provide supervision, then they will not be able to provide ABA services to NE Medicaid children and families.

Please recognize that behavior analysts know what they are doing with regard to the provision of behavior analytic services and they do not need to be supervised by a licensed psychologist, especially one who may not even have training in this area, by allowing BCBAs to be licensed providers in the state of Nebraska. The State of Nebraska needs to adopt licensure for Behavior Analysts to remove barriers to accessing services and establish proper regulation and oversight that ensures a profession trained to practice independently has the ability to serve the constituents of Nebraska and be held to high standards of practice.

Thank you

Dr. Patricia Zemantic