

## WABA Member Questions for DOH Regarding Behavior Analyst Licensure

Note: Answers to all questions are in bolded print.

1. We have a team of people doing in-home ABA services through research, but they are not billing for services. Will they also need to be licensed? **Yes, they need a license. Looking at the law, as written, it does not give an exemption for aba services delivered through a research project.**
2. If I want to arrange a shadow or observation session between a CBT and the new BT whose license is pending without the presence of the BCBA, is it still allowed? In this shadow session, the new BT won't be implementing the treatment plan but it is anticipated that there will be interactions between the BT and the client. **If the person shadowing is providing aba services then he/she will need a license. However, if they aren't providing ABA services as defined in the law, then he/she is similar to a nanny or babysitter and does not need a license.**
3. In looking at the application forms, the CBT training form requires an LBA license number (which ultimately makes sense). Does this mean that no training programs can start until the supervisor holds the LBA credential or that we can't submit any CBT applications until the supervisors credential comes back? Again, ultimately this makes sense but for qualifying current staff, it certainly puts a block in the process. Would love to hear DOH's response. **A BCBA # is accepted instead of an LBA #. The rules state that an LBA or BCBA can be responsible for initial training of the CBT.**
4. On the CBT application, it says, once you have completed the training program your supervisor must submit the form directly to the DOH. Does this mean the CBT applicant cannot include that completed form in their application packet—that it literally needs to be sent in separately by the supervisor? **You are correct. The CBT training form must be sent in separately from the application and licensing fee. It must be sent in from the Supervisor him/herself and sent to the "other documentation" credentialing address listed on the first page of the CBT application. Because Washington is a primary source state, all documentation must come from the primary source. In theory, it could be sent in a separate sealed envelope (supervisor signature along the seal) along with the application. However, it is advised to send them in separately.**
5. I want to apply licensure. Being that I am currently out of country, will it disqualify me? I do maintain a house and other asset in seattle. **Yes, there is nothing preventing a**

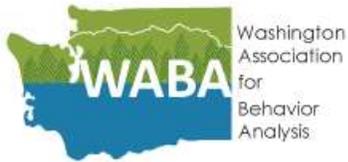


**professional from out of state to apply for Washington state licensure if he/she is planning on providing ABA services in the state.**

6. It is common practice that a CBT will have more than one supervisor. How does one account for this...
  - a. In the supervision agreement (can more than one supervisor sign)
  - b. For supervision activities: Can more than one supervisor fulfill the obligations described in WAC 246-805-330: 5 a-e? Particularly (e) which describes observing CBT with each client on caseload every 3 months as the designated primary supervisor may not be the supervisor on all of the CBTs caseload and therefore would have no reason/purpose for seeing that client.

**Yes, it is acceptable for more than one supervisor to be included on the supervision agreement. These documents are developed by the individual and his/her supervisor or the company they work for. How that supervision is documented is up to the individual, as long as requirements are being met and can be verified if the individual is ever audited.**

- c. What about having more than one training supervisor? **There needs to be one program supervisor (training program supervisor) who signs the attestation. Other supervisors who meet the requirements may be designated and overseen by the training program supervisor to provide training.**
7. I contacted the BACB a few minutes ago and realized that the individuals that are in a university program are unable to turn in the transcripts to become a RBT because all of the coursework and checklist did not occur within the 180 days stated in the RBT documents. Does the CBT for Washington follow the same rules? **Currently the rules state that all CBT training must be conducted within a 180 day period. The intent of this rule language is for a BT trainee who has been a trainee for 180 days to stop working with clients until they complete their application and obtain their CBT, not to stay in a trainee status. That said, it is up to the individual supervisor who signs off on the training form to determine if they think the qualifications for training have been met within the individual's most recent 180 days. Please keep in mind that all the rules state is that the applicant must have had 40 hours of classroom PLUS experiential experience that meet the required content. How much of their training is classroom and how much is experiential in the most recent 180 days is up to the supervisor who is signing the form.**
8. Are generic company email addresses acceptable as the primary email? **Email addresses cannot be a generic company email address, such as**



[info@company.com](mailto:info@company.com). Washington is a primary source state. So, all personal and demographic information provided must be specific to the individual applicant.

9. Can a company send in multiple applications at one time with one check? **Yes, multiple applications in one envelope with a single check for all fees is acceptable. Inside the envelope, please include a spreadsheet with each applicant's name, the credential he/she is applying for, and the amount from the check that should be attributed to that individual. Note the total amount for all individuals should add up to the amount of the check.**

10. What does "method of license" mean in section 6 (other licenses) on the LBA application?

**Method of License: is how a license was issued. Was this credential issued by exam, grandfathered, endorsement, reciprocity or education etc..... This section of the application is only for Health Credentials (Mental Health, Nursing Assistant, or State ABA license, etc....) held in other states as well as Washington. If an applicant holds another Washington State Health profession the applicant will not need to request verification, due to we can process within the credentialing department. If any other credential listed is from another state verification will be required. Note from WABA: we have asked for clarification on this response.**

11. Can an agency provide the AIDS training as part of their orientation training (i.e. not part of the required 40 hours of ABA training)?

**With additional research it appears that how an applicant receives and who provides AIDS training is fairly flexible.**

**WAC 246-12-270: Acceptable AIDS education and training.**

**(1) The regulatory entity will accept education and training that is consistent with the model curriculum available from the office on AIDS.**

**(2) AIDS education and training must include, but is not limited to, the following: Etiology and epidemiology; testing and counseling; infection control guidelines; clinical manifestations and treatment; legal and ethical issues to include confidentiality; and psychosocial issues to include special population considerations.**

**<http://www.doh.wa.gov/YouandYourFamily/IllnessandDisease/HIVAIDS/Prevention/Training/KNOWinEnglish>**