

MEMO

TO: Nevada State Board of Psychological Examiners
FR: CABI Subcommittee (Pat Ghezzi, Chair, Pam Becker & Shelia Young)
DT: February 9, 2015
RE: AB 6

The CABI Subcommittee met on January 10, 2015 to discuss AB 6 and the merits of repealing the state's CABI certification.

The impetus for repealing CABI certification appears to center on the growing imbalance in our state between the high demand for ABA services and the low supply of individuals with the credentials to provide these services at the CABI level. Advocates for children and families in our state are naturally frustrated and genuinely concerned about this imbalance and want to do something meaningful about it.

What AB 6 intends to do is to increase the supply of CABIs by eliminating state regulations that now require certificants to meet certain educational, training, examination, supervisory and legal requirements. By removing these regulations, the expectation is that the number of people who are willing or able to provide services will increase and eventually grow to meet the demand for services at this level in our state.

Attenuating the high demand for ABA services in Nevada is not our concern, however. Our sole concern is public safety and the professional practices and regulatory mechanisms that keep people safe. How public safety may be affected by repealing CABI certification, then, is the only basis for our concerns and recommendations regarding AB 6.

What is certain is that AB 6 will increase a supply of unidentified and unregulated workers operating with no clearly defined boundaries, roles and responsibilities. We believe public safety is compromised under these unrestricted, uncredentialed conditions. The fact that people at the CABI level work directly with our states' most vulnerable citizens heightens our concern and adds to the weight of our obligation to protect the public from growing a workforce of this sort in our state.

What we find objectionable about repealing CABI certification is that no suitable replacement is proposed. Fortunately, there is a credential that constitutes a suitable replacement: Registered Behavior Technician, or RBT. Administered by the BCBA, the credential establishes educational, training and supervisory standards for entry-level paraprofessionals such as CABI certificants. It complements BACB credentials (BCBA, BCaBA) and Nevada credentials (LBA, LaBA) and is widely endorsed by regulatory and funding stakeholders.

The subcommittee sees no public safety issues with repealing CABI so long as it is replaced with RBT. A second recommendation is that CABI certification remain in effect until it is replaced with the RBT credential. There may be options to retaining CABI in the interim (see NAC 641.168), but in any case it is in the public's best interest, in our view, to keep this workforce regulated throughout the transition to RBT. Once this transition is complete, we further recommend that the board require RBTs and their respective supervisors to register annually with the Board.

Should the Board elect to follow these recommendations, we suggest putting the Legislative Subcommittee in contact with the authors and advocates of AB 6 to work on the relevant revisions.