



**ASHA**  
American  
Speech-Language-Hearing  
Association

July 31, 2019

The Honorable Thomas Mehaffie  
159B East Wing  
P.O. Box 202106  
Harrisburg, PA 17120-2106

RE: Draft Applied Behavioral Analyst Licensure Bill

Dear Representative Mehaffie:

On behalf of the American Speech-Language-Hearing Association, I write to oppose draft language to amend the audiology and speech-language pathology practice act to include applied behavioral analysts (ABA).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists identify, assess, and treat speech and language disorders, including swallowing disorders. Over 8,350 ASHA members reside in Pennsylvania.

ASHA has multiple concerns with the proposed draft language for ABAs. The first concern is adding ABAs to the practice act of audiologists and speech-language pathologists. Since behavior analysis, by definition, is the science of behavior, ABAs are typically licensed under psychology boards; about 30 states having undertaken such licensure. While audiologists and speech-language pathologists (SLPs) are specifically educated and trained to assess and treat communication disorders. Licensing laws exist for audiologists and speech-language pathologists in all 50 states as well as the District of Columbia. Currently, state do not license ABAs under the same board as audiologists and speech-language pathologists due to the potential conflict of interest of ABAs engaging in treatment that is perceived as going beyond their own scope of practice and infringing on the scope of practice for speech-language pathologists.

A second concern is the only requirement for licensure is for licensees to be Board Certified Behavior Analysts, a private certification given by the Behavior Analyst Certification Board (BACB). However, if the BACB changes their requirements, Pennsylvania will have no recourse.

Finally, ASHA is concerned with the following section:

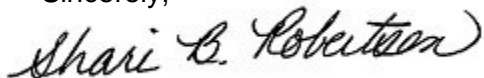
“(7) an individual licensed to practice behavior analysis in this commonwealth as long as the speech-language services provided by the licensed behavior analyst are practiced within the behavior analyst’s code of ethics as determined by board and the licensed behavior analysts does not represent oneself as a licensed speech-language pathologist unless also licensed as a speech-language pathologist under this act.”

However, there are **no** circumstances under which an ABA should be providing speech-language pathology services.

The services provided by ABAs are separate and distinct from those provided by SLPs. For example, autism spectrum disorder (ASD) is a complex neurobiological disorder characterized by social impairment, communication difficulties, and repetitive and stereotyped behaviors, which both SLPs and ABAs often participate on a treatment team. Speech-language and social communication impairments are the core traits of individuals with ASD for which SLPs play a central role in assessing and treating. While ABA therapists may work on an individual's behaviors, SLPs focus on understanding and use of language, social communication, literacy, speech production, and augmentative and alternative communication. The appropriate assessment and treatment of ASD involves a multidisciplinary team of professionals collaborating with one another to ensure that these individuals receive all appropriate services necessary to achieve successful outcomes.

Thank you for your consideration of ASHA's recommendations on this draft bill. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at [sadams@asha.org](mailto:sadams@asha.org).

Sincerely,

A handwritten signature in cursive script that reads "Shari B. Robertson".

Shari B. Robertson, PhD, CCC-SLP  
2019 ASHA President