Regarding 21 NCAC 05.0201 APPLICATION FOR LICENSURE OF LICENSED BEHAVIOR ANALYST 4 AND LICENSED ASSISTANT BEHAVIOR ANALYST

- We recommend that a more definitive timeline for application submission and board consideration be included in the rules. Ideally, applications would be due on a particular day of the month, and then board meetings would be appropriately scheduled to consider those applications before the month-end.

Regarding 21 NCAC 05.0401 SUPERVISION OF ASSISTANT BEHAVIOR ANALYST And 21 NCAC 05.0402 SUPERVISION OF BEHAVIOR TECHNICIANS

We respectfully request that generally accepted standards of care (i.e., Applied Behavior Analysis Practice Guidelines\(^1\)) be appropriately referenced when clarifying the provision of applied behavior analysis, including the supervision of assistant behavior analysts and behavior technicians.

Regarding 21 NCAC 05.0403 TELEHEALTH AND TELEPRACTICE

We respectfully request that generally accepted standards of care (i.e., Practice Parameters for Telehealth ABA\(^2\)) be appropriately referenced.

- We also request that the term “split fees” be clearly defined.

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\(^1\) Applied Behavior Analysis Treatment of Autism Spectrum Disorder: Practice Guidelines for Healthcare Funders and Managers (2nd ed.)

\(^2\) Practice Parameters for Telehealth ABA

Thank you for your consideration,

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