



September 28, 2012

Kevin D. Arnold, PhD, ABPP, President  
The Behavioral and Cognitive Psychology Specialty Council  
c/o 4624 Sawmill Road  
Columbus, OH 43220

Dear Kevin,

In your letter dated August 24, 2012 and Dr. William Stiers' letter dated August 23, 2012, the BACB was asked to "officially modify [its] position against appropriately trained and certified psychology specialists performing applied behavior analysis." This was a bit of a surprise to us, because the BACB has never taken this position. However, we now recognize that the prior version of the BACB model licensure act for behavior analysts might have been interpreted in this way by some. The efforts to revise our model act, including an exemption for licensed psychologists, were already underway when we received both letters, so the timing worked well. The revised model license act was approved by the BACB Board of Directors and sent to you on September 24, 2012.

However, you stated in your September 26, 2012 letter that the revised exemption was insufficient because it did not explicitly address those supervised by licensed psychologists. Our interpretation of the act is that licensed psychologists would be responsible for their supervisees and that the practice of the supervisees would be deemed psychological in nature and thus, no exemption would be needed. However, after speaking with our Board president, Dr. Jane Howard, as an act of good faith and to ensure no further misunderstandings, we will now include in our commentary that the exemption applies to supervisees. The new exemption for licensed psychologists (with comment) appears below.

F.1. An individual authorized to practice Psychology within the State, so long as the applied behavior analysis services provided by the Licensed Psychologist are within the Licensed Psychologist's education, training, and experience;

***Comment:** This exemption should also apply to individuals acting under the extended authority and direction of Licensed Psychologists (e.g., doctoral students, postdoctoral fellows).*

We hope that moving forward concerns about practice issues are first thoroughly explored in an environment of mutual trust and respect. We have acted in good faith to address the practice of psychologists (and now their supervisees) in our model licensure act and trust that our seat on the Specialty Council will be secure. If you feel otherwise, please let me know so we may reconsider our affiliation with the organization.

We look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "James E. Carr". The signature is fluid and cursive, with a large initial "J" and "C".

James E. Carr, PhD, BCBA-D  
*Chief Executive Officer*