

**Burgos, Alexander N**

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**Subject:** FW: [External] 21 NCAC 05 Requests for Changes - November 2022 RRC

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**Sent:** Thursday, November 10, 2022 5:00 PM

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**Subject:** [External] 21 NCAC 05 Requests for Changes - November 2022 RRC

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**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<sup>[1]</sup>) 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<sup>[2]</sup>) be appropriately referenced.**

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

<sup>[1]</sup> [Applied Behavior Analysis Treatment of Autism Spectrum Disorder: Practice Guidelines for Healthcare Funders and Managers \(2nd ed.\)](#)

<sup>[2]</sup> [Practice Parameters for Telehealth ABA](#)

Thank you for your consideration,

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