

**Department of Health**  
**Office of Health Professions**  
**Interpretive Statement**

<i>Title:</i>	Supervision of Applied Behavior Analysis Licensees by Psychologists	<i>Number:</i> HP-9-27-17
<i>References:</i>	<a href="#">Chapter 18.380 RCW</a> , <a href="#">Chapter 18.83 RCW</a> , <a href="#">Chapter 246-805 WAC</a> , <a href="#">Chapter 246-924 WAC</a>	
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<i>Approved By:</i>	Kristin Peterson, Assistant Secretary Health Systems Quality Assurance	

The Department of Health (department) interprets RCW 18.380.030(1) to encompass Washington state licensed psychologists' practice of Applied Behavioral Analysis (ABA) including the supervision of licensed assistant behavior analysts (LABA) and certified behavior technicians (CBT). When supervising these credential types, the psychologist needs to be cognizant of and adhere to the licensing and supervision requirements as defined in chapter 246-805 WAC--Applied Behavior Analysis. This conclusion is in response to the department being asked by key constituents if Washington state licensed psychologists can supervise licensed assistant behavior analysts and certified behavior technicians.

## **Background and Analysis**

### Background

[Substitute Senate Bill \(SSB\) 5488](#), enacted in 2015 and codified as [chapter 18.380 RCW](#), established the Applied Behavior Analysis Program. As of July 1, 2017, a license is required to provide ABA client services.

Chapter 18.380 RCW states LABAs and CBTs are required to be supervised as a condition of licensure. Proof of ongoing supervision by a licensed behavior analyst (LBA) is required to obtain an initial license or certification ([RCW 18.380.050 \(2\)](#)). Once credentialed, supervision of an LABA must be by an LBA ([RCW 18.380.010 \(4\)](#)), while supervision of a CBT must be by either an LABA or LBA ([RCW 18.380.010\(1\)](#)).

However, RCW 18.380.030<sup>1</sup> acknowledges that other health care licensees may provide ABA services when ABA is within the profession's scope of practice. The practice of applied behavior analysis is within a licensed psychologist's scope of practice.<sup>2</sup> In order to provide ABA services, psychologists must deliver these services according to the ABA standards of care and demonstrate competency in ABA gained through education, training, and/or experience.

### Analysis

The ABA service delivery model requires a lead provider with a high level of competency in ABA. Under this model, the lead provider supervises multiple staff members who provide direct services to clients, and a CBT will often carry out the treatment plan the lead provider develops. Thus, supervision of ABA credential holders is an integral part of delivering ABA services.

Psychologists who are competent in ABA have the knowledge, skills, and abilities to lead a team of other ABA providers, and provide comprehensive ABA services. Supervision of staff members is within a psychologist's scope of practice. Psychologists also have rules in place to guide supervising staff members.<sup>3</sup> The oversight and supervision a psychologist provides is consistent with the intent of ABA rules for supervising and being accountable for the services LABAs<sup>4</sup> and CBTs<sup>5</sup> provide. Since supervision is an integral part of the practice of ABA and psychology, the exemption in RCW 18.380.030(1) encompasses licensed psychologists' supervision of subordinate ABA providers.

### **Conclusion**

The department interprets RCW 18.380.030(1) to encompass Washington state licensed psychologists' practice of ABA including the supervision of LABAs and CBTs. When supervising these credential types, the psychologist needs to be cognizant of and adhere to the licensing and supervision requirements as defined in chapter 246-805 WAC--Applied Behavior Analysis.

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<sup>1</sup> RCW 18.380.030(1) states that "Nothing in this chapter may be construed to prohibit or restrict: (1) An individual who holds a credential issued by this state, other than as a licensed behavior analyst, a licensed assistant behavior analyst, or a certified behavior technician, to engage in the practice of that occupation or profession without obtaining an additional credential from the state, so long as the practice is within that profession's or occupation's scope of practice."

<sup>2</sup> [RCW 18.83.010\(1\)](#)

<sup>3</sup> [WAC 246-924-030 Guidelines for the employment and/or supervision of auxiliary staff.](#)

<sup>4</sup> [WAC 246-805-240 Licensed assistant behavior analyst – Continuing supervision.](#)

<sup>5</sup> [WAC 246-805-330 Certified behavior technician – Continuing supervision.](#)