

Monday October 18, 2015

Dear South Dakota Applied Behavior Analysis Provider Workgroup,

The helping professions, especially the areas of mental health and developmental disability treatment, encompass many well-intentioned individuals from various approaches that attempt to compassionately alleviate the suffering humans will inevitably encounter. The field of psychology has been the origin of many of these helping professions.

Not too long ago, other helping professions such as counseling, marriage and family therapy, and social work found a unique identity and became professionally separate fields from psychology altogether. This has led to an academic and professional standard in each field that only those with intimate training in the field could truly appreciate and understand.

This is especially true of the field of Applied Behavior Analysis (ABA). The use of individualized research designs and empirical methods yield a unique form of treatment. It requires specialized training and peer-review/governance of those utilizing the same scientific methodology. Although it may appear, prima facie, that ABA is "close-enough" to psychology to be governed under the same board, this is philosophically, scientifically, and pragmatically incorrect.

With a background of graduate level training in clinical mental health counseling, vocational rehabilitation counseling, and applied behavior analysis, I can speak from a professional standpoint that ABA is a unique profession onto itself and its efficacy is due to the rigorous standard that ABA has set for itself as a distinct profession. Being governed by an outside board separate from their own, would weaken the efficacy of ABA and the techniques that it utilizes, as well as, potentially making another board govern the standards of a science that they themselves don't entirely espouse.

I wholly support and recommend behavior analysts have their own board. Knowing ABA's commitment to efficiency and data based decisions along with the guidance of the Behavior Analysis Certification Board and the Association of Professional Behavior Analysis, a separate board will be economically viable and in the best interest of the state of South Dakota.

Sincerely,

Brandon Thomas Rausch, MS, NCC, CRC