



April 6, 2021

The Honorable Heidi Seevers Gansert
Nevada Senate
316 California Avenue, #519
Reno, NV 89509

RE: ASHA Comments on Applied Behavioral Analysis; S.B. 217

Dear Senator Seevers Gansert:

On behalf of the American Speech-Language-Hearing Association, I write in support of S.B. 217 with amendments proposed below. Senate Bill 217 includes transferring responsibilities concerning licensing and regulation for the practice of applied behavior analysis (ABA) from the Aging and Disability Services Division of the Department of Health and Human Services to the Board of Applied Behavior Analysis and makes provisions governing providers of health care applicable to behavior analysts, assistant behavior analysts, and registered behavior technicians.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 800 ASHA members reside in Nevada.¹

Autism spectrum disorder (ASD) is a complex neurobiological disorder characterized by social impairment, communication difficulties, and repetitive and stereotyped behaviors for which speech-language pathologists (SLPs) play a critical role in assessing and treating. Social interaction and communication, speech production, understanding, and using spoken and written language are examples of neurodevelopmental functions. They are not solely "behaviors."

ASHA maintains that SLPs should be included in any comprehensive assessment and treatment for individuals with ASD since SLPs are able to prioritize intervention objectives and coordinate planning for communicative success. While ABA therapists may work on an individual's behaviors, SLPs have the educational background that enables them to focus on understanding and using language, social communication, literacy, speech production, and augmentative and alternative communication. A recent ASHA Schools Survey indicated that 92% of school based SLPs provide services to students on the autism spectrum.²


Individuals with communication disorders, and their families, must be provided with a full complement of services designed to meet their individual needs. Allowing individuals without the appropriate education and training to make assessment decisions about an individual's communication needs may result in an inaccurate assessment and inappropriate recommendations for services to the family. Utilizing a team of qualified professionals including physicians, mental health professionals, SLPs, ABA therapists, and others will ensure that an individual diagnosed with ASD receives a comprehensive assessment and the full complement of services necessary to meet their unique needs.

ASHA recommends the following amendments relating to the practice of ABA in Section 48. 2 NRS 437.040 (deletions underlined, additions in **bold**):

The term does not include the diagnosis of disorders, psychological testing, psychotherapy, cognitive therapy, psychoanalysis, and counseling, **or the diagnosis or treatment of communication disorders as defined as the practice of audiology and the practice of speech-language pathology under NRS 637B.050 and NRS 637B.060.**

Thank you for your consideration of ASHA's recommended amendments to S.B. 217. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org.

Sincerely,



A. Lynn Williams, PhD, CCC-SLP
2021 ASHA President

¹ American Speech-Language-Hearing Association. (2020). *Nevada* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/Nevada-State-Flyer.pdf>.

² American Speech-Language-Hearing Association. (2020). *Schools Survey* <https://www.asha.org/siteassets/surveys/2020-schools-slp-summary.pdf>.