

Hon. Tracy MacCharles
Ministry of Children and Youth Services
14th Floor, 56 Wellesley Street West
Toronto, Ontario
M5S 2S3



Cc: Alexander Bezzina, Deputy Minister
Ministry of Children and Youth Services

Cc: Jane Cleve, Director of Specialized Services and Supports
Ministry of Children and Youth Services

Dear Minister MacCharles,

I am writing to you on behalf of the Ontario Association for Behaviour Analysis (ONTABA), an affiliated chapter of the Association for Behavior Analysis International and an Affiliate of the Association of Professional Behavior Analysts. ONTABA's mission is to demonstrate leadership, knowledge, and innovation in education, training, and research for the ethical and effective application of behaviour analysis. At present ONTABA is the largest professional organization representing behaviour analysts in Canada. We serve as a resource for practitioners and consumers of behaviour analytic services, a respected community partner, and a dedicated advocate for individuals in need of life-changing behaviour analytic services.

We are pleased by the recent announcement from the Ministry of Children and Youth Services regarding the expanded children's autism program and the associated \$333 million investment in service development over the next five years. Increasing access to services, reducing wait times, ensuring that children receive effective services within early developmental years, and expanding applied behaviour analysis (ABA) services for children over the age of five are laudable steps toward the goal of enhancing outcomes for children with autism spectrum disorders (ASD). Our membership consists of hundreds of ABA practitioners, many of whom have dedicated their careers to working with individuals with ASD by providing evidence-based treatment, conducting research, and enhancing capacity through education and supervision. For this reason, the implications of the announcement are of great interest to our membership and to the children and families they serve.

ONTABA shares the Ministry's goal of increasing the availability of high-quality, evidence-based ABA services that will lead to optimal outcomes, protection from harm, and improved quality of life for children and youth with ASD and their families. Given this common goal, we would like to offer our expertise to the Ministry. We would also like to respectfully request clarifications regarding the following aspects of the recent announcement to ensure that we understand the Ministry's objectives and are communicating to our membership, families, and the general public in as accurate a manner as possible.

1. The plan to revamp the ABA-Based Services and Supports Program for children over the age of five to include ABA services of greater intensity and duration is welcomed. To ensure that the plan is grounded in the best available scientific evidence, we offer our assistance to the Ministry in reviewing the large and robust body of research on the efficacy of both focused and comprehensive ABA interventions for building skills and reducing problem behaviours in people with autism throughout the lifespan (for recent

comprehensive reviews, see National Autism Center, 2015 and Wong et al., 2014). We can also help translate that research into guidelines for developing individualized, clinically warranted ABA interventions. To protect children and youth with ASD and their families, ONTABA strongly recommends that ABA intervention plans be designed, overseen, and implemented by individuals who meet the standards of training and competence in behaviour analysis that have been established by the profession (see www.bacb.com for international certification standards).

2. One of the immediate implications of the plan to transition children five and above who are on the waitlist or who are currently receiving IBI to different service options is an increase in the number of children with ASD who will be entering the school system over the next 6-12 months. Further, as the changes to the Ontario Autism Program are expected to roll out over several years, these children (many of whom have been waiting for, or recently started receiving, evidence-based behavioural services) may not have immediate access to appropriately individualized, effective behavioural service options. Our membership and stakeholders are concerned about the potential effects of these changes on children and their families. ONTABA advocates for an approach that is consistent with our ethical obligation to protect the best interests of our clients (see the Behavior Analyst Certification Board Professional and Ethical Compliance Code, <http://bacb.com/ethics-code/>) while also taking a compassionate and concerted approach to providing the best available supports to individuals that have been waiting for life-changing behaviour analytic services. We would like to offer our assistance in developing an immediate, suitable model of service to address this cohort of children. We also encourage this Ministry to work collaboratively with the Ministry of Education to build capacity beyond the currently available school-based services, which were highlighted as requiring development in the *Autism Spectrum Disorder in Ontario 2013* report. Increasing collaboration between current service providers and school boards during the transition, and increasing the number of appropriately qualified professional behavior analysts who work within the school system, would greatly increase the likelihood of smooth and effective transitions for children exiting the IBI programs. We respectfully suggest that specific guidelines for accomplishing these transitions be made available to autism service providers, school boards, and other stakeholders. ONTABA would welcome the opportunity to be involved in the development of such guidelines.
3. The focus on access to intervention within developmentally sensitive periods by children with an ASD diagnosis and those at risk for ASD is encouraging; however, we are wondering about the scientific evidence on the efficacy of the recently announced early intervention pilot programs. Our concern stems from the fact that unfortunately, many of the reviews and meta-analyses cited in the January 2014 report titled *Autism Spectrum Disorder in Ontario 2013* conflate studies of ABA interventions with studies of other intervention models that are sometimes described as “behavioural” or “based on ABA” but do not have the well-established defining characteristics of ABA or comparable supporting evidence. Although there is some published, peer-reviewed research on these packaged, mixed-method early intervention programs for young children with ASD (such as the Early Start Denver Model), there are many more studies demonstrating the efficacy of highly individualized intensive, comprehensive ABA interventions that are designed and overseen by professionals with documented training and competence in behaviour analysis (see Eldevik et al., 2009 and 2010 for meta-

analyses of multiple published studies of genuine early intensive ABA). Further, unlike other early intervention models, the wide array of procedures for building functional skills and decreasing problem behaviours that comprise intensive, comprehensive ABA intervention have been evaluated in many hundreds of scientific studies. This supporting research does not appear to have been considered in the January 2014 report. ONTABA members urge the Ministry to enlist expert behaviour analysts to assist in reviewing the published scientific research on ABA interventions separately from the research on developmental and mixed-method intervention models. Behaviour analysts are ethically obligated to use and recommend interventions that have proved most effective in scientific research and are eager to serve as a resource.

4. In light of the plan to invest significant efforts and money in improving and expanding the Ontario Autism Program, we believe it is critical to initiate appropriate regulation of practitioners of ABA in the province as soon as possible. In order to protect the public, build capacity, and ensure that all consumers have access to ABA services delivered and overseen by qualified providers, it is essential to set standards that are consistent with the Behavior Analyst Certification Board credentialing requirements as well as recommendations from the 2015 SEG report commissioned by MCYS and stakeholders surveyed for the *Autism Spectrum Disorder in Ontario 2013* report. ONTABA is eager to work with MCYS on this process.
5. Since the authors of the *Autism Spectrum Disorder in Ontario 2013* report recommended that ASD services be multidisciplinary in nature and emphasized ABA repeatedly, we again advocate strongly for representation of Board Certified Behaviour Analysts (BCBAs) on the Clinical Expert Committee, its sub-committees, and the advisory group referenced in the March 29th 2016 MCYS announcement. As credentialed professional practitioners of the discipline of behaviour analysis, Ontario BCBAs are well-qualified to provide input on the creation of guidelines and systems for implementing the new plans. ONTABA will be pleased to recommend individuals for these important roles.

In closing, we greatly appreciate the Ministry's direct support and funding of ABA services over the past 15 years and its previous inclusion of BCBAs in its research and planning efforts. ONTABA would welcome the opportunity to reinstate that relationship by meeting with you to discuss our recommendations and to share the perspectives of our members as expressed in a survey on the Ontario Autism Program announcement that we conducted recently. We are certain that you will find those data valuable as we work towards effective and efficient implementation of the new plans. Additionally, ONTABA would like to offer its assistance during the upcoming transition to ensure that Ontario children and youth with ASD receive high quality, evidence-based ABA interventions.

Sincerely,
Louis Busch, President
ONTABA Board of Directors
president@ontaba.org



April 7th, 2016

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