

To: Human Services Department

From: Centria Healthcare

Date: September 17

Re: Open Comments on *New Mexico Administrative Code (NMAC): 8.321.2 Specialized Behavioral Health Services.*

Thank you for your time and consideration to review our public comments regarding New Mexico Administrative Code (NMAC): 8.321.2 Specialized Behavioral Health Services. Centria is looking forward to serving your members and our partnership together.

For section 8.321.2.12, part B. Eligible Providers, section 4:

(4) Stage three Behavioral Technician (BT): A BT, under supervision of a BA, may assist stage two and implement stage three ABA treatment plan interventions and services.

a. ***Recommend changing requirement to, “All BTs will receive BACB Registered Behavior Technician (RBT) training (or something professionally comparable) conducted by a professional experienced in ABA services, but is not required to register with the BACB upon completion in order to furnish services.”*** This change does not diminish the need for quality training of paraprofessionals, but does prevent an unnecessary restriction on what is already a scarce resource.

b. If the RBT registration requirement is kept, recommend *BT must complete 40 hours of RBT training prior to the beginning of services. However, allow the Behavior Technician up to 6 months from their first date of service to achieve an RBT certification.* This would allow current BTs a grace period to obtain certification.

c. If the RBT registration requirement is kept, would further recommend *not limiting registration to the BACB alone, but open to other ABA certifying boards as well.*