



*Speaking Out for Autism Spectrum Disorder*  
*in the Australian Capital Territory*

email: [chair@sofasd.org.au](mailto:chair@sofasd.org.au)  
website: <http://sofasd.org.au>

Ms Y Berry MLA  
Minister for Education and Early Childhood Development  
Australian Capital Territory Legislative Assembly  
GPO Box 1020  
Canberra ACT 2601

Dear Ms Berry MLA

Subject: **recognise behavioural clinicians in the ACT**

Thank you for your response (29/3/2017) to our emails.

SOfASD is disappointed that you chose to deny implicitly our request to meet (made in our letter 30/1/2017).

In your response, you wrote:

... there is no scheme for specialist psychology registration in behaviour.  
Behaviour on its own is not an endorsed area of practice and behaviour analysis is not a regulated profession in Australia.

While “behaviour analysis is not a regulated profession in Australia”, SOfASD would like to remind you that:

- the Behavior Analyst Certification Board has an *international* scheme for registration of specialist clinical behaviour analysts – there is a comprehensive list of registered *Board Certified Behavior Analysts* (BCBAs) who reside and work in Australia on the Behavior Analyst Certification Board website (see <https://bacb.com/>); and
- specialist behavioural clinicians may originate in disciplines other than psychology.

Many people who live with autism spectrum disorder (ASD) are alarmed that governments in Australia, including your ACT government (and the NDIA), refuse to recognise registration via the international Behavior Analyst Certification Board. Apparently, governments in Australia prefer that this critical area of clinical practice remains unregulated.

Your letter says:

“this does not mean that school psychologists are not qualified to provide a high standard of support in behaviour management”



We are not confused by double negatives. That school psychologists are not registered to provide specialist behavioural interventions actually means that school psychologists are *not registered* or certified to provide behaviour management at any level. It means that *if* any are qualified, then their qualification is *not recognised*. In the ACT Education Directorate, there is no discernible attempt to determine and recognise the skills of school psychologists in the area of applied behaviour analysis (ABA) and behaviour management. Given the abysmal understanding of and oft mentioned concerns about ABA, it is disappointing that your directorate endorses, even promotes, this unregulated approach.

Your letter says:

“The ACT selects school psychologists for employment based on their ability to demonstrate required professional knowledge and practice”

However, your government says skills in *applied behaviour analysis and behaviour management* are not “required professional knowledge and practice”; they are not even recognised skills or “an endorsed area of practice”, let alone a registerable area of “professional knowledge and practice”.

SofASD appreciates your suggestion about raising concerns about accreditation for behavioural practices with Australian Health Practitioner Regulation Agency (AHPRA).

Your letter says:

“it is not for the Directorate to adopt [professional organisation credentials] as mandatory”.

SofASD notes that speech therapists employed by the ACT government are not registered through AHPRA. SofASD also notes that the ACT government created its own teacher registration agency – see <http://www.tqi.act.edu.au/>. It is entirely possible, when it so desires, for the ACT Government to create or adopt a credentials scheme.

For years, ACT government officials have been telling parents of newly diagnosed autistic children that “ABA does not work”. This so-called “advice” is contrary to the conclusions from experts who provided a series of systemic reviews of research to the Commonwealth Government. The reviews conclude that ABA does work for many autistic children and has *the best* scientific evidence of efficacy for autistic children. The latest of these reviews is on the NDIS [Information, publications and reports](#) webpage (links: [Autism spectrum disorder: Evidence-based/evidence-informed good practice for supports provided to preschool children, their families and carers \(DOC 190KB\)](#) or [PDF 630KB](#)) below the heading, *Early childhood early intervention research*. The earlier systemic reviews of research are available at <http://a4.org.au/node/965> and a summary from the 2011-12 review reported that ABA for early intervention (it says nothing about general behavioural support) is the *only* intervention rated as having “established research evidence” – see <http://a4.org.au/sites/default/files/2012ASfARtable.pdf>.

Researchers in the USA report that best practice (usually) ABA or *Early Intensive Behavioural Intervention* results in “very positive” or “optimal” outcomes where small percentages (10-20%) of autistic children lose their ASD diagnosis (links [here](#) or [here](#)).

ACT officials give their so-called advice, that “ABA doesn’t work”, when their entire knowledge of the subject is that Pavlov used it with dogs (where apparently, it did work very effectively). Notice that it is unprofessional conduct for any clinician/professional, including those employed by the ACT Government, to give any advice or make any comment about a subject that they know little about, such as ABA in this case.

SOfASD asks the ACT Government to ensure that its clinical staff behave more professionally and stop telling families of autistic children that “ABA does not work”. Recently, [Submission No. 88](#) from *Communication Rights Australia* to the Productivity Commission for its [NDIS review](#) said:

27. While the domestic and international research on the efficacy of Applied Behaviour Analysis (“ABA”) is united in relation to it being the only established evidence-based treatment for Autism Spectrum Disorder, ABA in Australia is unregulated. Any individual can pronounce themselves as able to provide ABA services to people with disabilities.

The [addendum to the submission](#) lists research and numerous systemic reviews of relevant research that support/amplify the conclusions of the Australian systemic reviews mentioned above.

Your letter says “the Directorate promotes a positive approach to behaviour support, based on comprehensive assessment and analysis of function of behaviour”. In the past, the Directorate has expressed a strong preference for *Positive Behaviour Support* (PBS) rather than ABA. SOfASD notes that the international *Association for Positive Behaviour Support* (APBS, see <http://apbs.org/>) states clearly on the front page of its website that:

**APBS** is an international organization dedicated to promoting research-based strategies that combine applied behavior analysis and biomedical science with person-centered values and systems change to increase quality of life and decrease problem behaviors.

Few people are qualified to practice in both ABA and biomedicine (pharmacology) so PBS needs a team of qualified clinicians. SOfASD is not aware of the Directorate employing anyone who is qualified or registered to practice in either ABA or biomedical science. SOfASD notes that Functional Behaviour Assessment, which is fundamental in behaviour management, is shared practice between ABA and PBS. We note that your current recruitment effort (see Addendum 2 below) does not mention or require knowledge of or experience in PBS. While there is no registration or certification for PBS practitioners, in 2007 the APBS published its [Positive Behavior Support Standards of Practice: Individual Level](#). SOfASD could not find mention of or compliance requirement/expectation documented for these standards in your recruitment of Senior Psychologists. Nor can we find any mention of or reference to this PBS standards on the Directorate website.

SOfASD is very disappointed that the ACT government:

- opposes recognition of international standards and qualification requirements for behavioural practices;
- employs people for roles involving behaviour management but cannot/does not assess their suitability for the role; and
- promotes self-aggrandisement of untested behavioural expertise when the ASD community is extremely concerned about poor (even damaging) practice in this unregulated area of clinical practice.

SOfASD asks that the ACT Government requests AHPRA to accredit behavioural clinicians in Australia.

SOfASD also recommends that the ACT Government ensures every school psychologist who is involved with autistic school students needing behavioural support in ACT schools is a certified behavioural clinician. Currently, this means every school



psychologist who supports an autistic student should be a registered BCBA (that is, registered with the international Behavior Analyst Certification Board ... as there is no other registration or certification available). SofASD is disappointed that the ACT Education Directorate is continuing its practice of using the unregistered behavioural practice that resulted infamously in the internationally renowned boy-in-the blue-cage episode. On-going commentary from the ASD community shows that there has been no discernible change in practice in ACT schools for autistic students with behavioural issues.

Note that if the Education Directorate does not adopt registered ABA practice to address the behavioural needs of autistic students, the alternative is to continue its systematic use of *unregistered* behavioural practice and physical or chemical restraints. SofASD regards this as an *unacceptable* strategy for autistic students. Experience shows that this *unacceptable* approach is often detrimental for autistic students.

SofASD is willing to work with the Education Directorate to develop practical monitoring and reporting processes for behaviour support of autistic students in ACT schools.

For your convenience, we provide a list of recommendations from the material above in Addendum 1 below.

Please feel free to contact SofASD if you want more information.

Sincerely

Bob Buckley  
Chair, Speaking Out for Autism Spectrum Disorder

13/4/2017

<b>Cc: Mr A Barr MLA, Chief Minister</b>	<a href="mailto:barr@act.gov.au">barr@act.gov.au</a>
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## Addendum 1: List of recommendations

In the letter above, SOfASD made the following recommendations.

1. SOfASD asks the ACT Government to ensure that its clinical staff behave more professionally and stop telling families of autistic children that “ABA does not work”.
2. SOfASD asks that the ACT Government requests AHPRA to accredit behavioural clinicians in Australia.
3. SOfASD recommends that the ACT Government ensures every school psychologist who is involved with autistic school students needing behavioural support in ACT schools is a certified behavioural clinician.

## Addendum 2: Current recruiting for Senior Psychologist

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**Job Number :** 21042

**Type and Location :** Clinical / ACT

**Listed By :** ACT Education Directorate on 5 Apr 2017

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**ACT**  
Government

### Senior Psychologist

**Education**  
**School Performance and Improvement**  
**Student Engagement**  
**Student Wellbeing**

#### Senior Psychologist

**Senior Psychologist**  
**Salary Range:** \$121,617 (PN: 02752, several)

An exciting opportunity exists for an innovative leader to join the ACT Education Directorate as a Senior Psychologist. Senior Psychologists work as part of a multi-disciplinary team, from an ecological perspective, to support students with complex needs and challenging behaviours. The successful candidate will use their psychological expertise to lead the identification and implementation of evidence based practice within a multidisciplinary team and within schools; as well as supporting the professional practice of School Psychologists.

**Eligibility/Other Requirements:** Applicants must have: Full registration for at least three years as a psychologist with the Psychology Board of Australia, or Full registration for at least three years as a psychologist with the Psychology Board of Australia and Teacher registration with ACT Teacher Quality Institute. A current registration issued under the *Working with Vulnerable People (Background Checking) Act 2011*. For further information on Working with Vulnerable People registration refer to - [https://www.accesscanberra.act.gov.au/app/answers/detail/a\\_id/1804](https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/1804)

**Note:** There is a permanent position available and also a temporary position available from 26 April 2017 until 26 April 2018 with the possibility of extension.

Applicants should note that a Joint Selection Committee (JSC) established in accordance with the collective/enterprise agreement provisions will assess all applications for this position.

**Contact Officer:** Beth Matters (02) 6207 6986 [beth.matters@act.gov.au](mailto:beth.matters@act.gov.au)

For further information, please visit [www.jobs.act.gov.au](http://www.jobs.act.gov.au)

**Applications Close:** 14 April 2017

#### Contact Details

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