

B. BEHAVIOR ANALYST LICENSING

Please be advised that there are many requirements to obtain licensure as a behavior analyst in Arizona. Below are some frequently asked questions. However, it is highly recommended that you review the Board's licensing requirements which can be found on the Board's website, <https://psychboard.az.gov>, under the "Statutes and Rules" tab. Specifically, A.R.S. §32-2091.02 and 32-2091.03 pertains to licensure. Additionally, it is recommended that you review the Board's Rule pertaining to the education and supervised experience requirements. R4-26-404.1 and R4-26-404.2 pertains to the education and supervised experience requirements.

1. I HAVE A CLIENT MOVING TO ARIZONA WHO WANTS TO CONTINUE CARE. DO YOU HAVE A TEMPORARY LICENSE FOR THIS CIRCUMSTANCE?

No, Arizona does not offer a temporary license for this circumstance. However, you may qualify for exemption from licensure if you will be offering behavior analyst services for this client for no more than 20 days in a calendar year. This would include not only your time spent with your client, but also any time spent on the client's records or in research for the client (even if this does not occur in Arizona). The Board has defined "day" to mean eight (8) hours. Therefore, you may be exempted from licensure if you qualify under ARS § 32-2091.08(A)(4), which states,

A. This article does not limit the activities, services and use of a title by the following:

4. A person who resides outside of this state and who is currently licensed or certified as a behavior analyst in that state if the activities and services conducted in this state are within the behavior analyst's customary area of practice, do not exceed twenty days per year and are not otherwise in violation of this article and the client, public or consumer is informed of the limited nature of these activities and services and that the behavior analyst is not licensed in this state.

2. DOES ARIZONA HAVE RECIPROCITY WITH OTHER STATES?

Not exactly by that term. Arizona has licensure by universal recognition. On August 27, 2019, A.R.S. § 32-4302 became effective. An application for licensure by universal recognition has been made available on our website for those who qualify. You may be eligible for licensure by universal recognition if you have been licensed as a behavior analyst for a year or more in another state, have never had a license revoked or suspended, do not have an open complaint against a license, and have established residence in Arizona. Proof of Arizona residence and official or certified verification of all licenses you hold or have ever held will be required. Please see the full list of requirements on the first page of the application.

3. WHICH APPLICATION DO I COMPLETE?

Behavior Analyst Application for Licensure: An individual applying for a behavior analyst license who has not held a behavior analyst license in another state for a year or more is required to complete the Behavior Analyst Application for Licensure.

Behavior Analyst Application for Licensure by Universal Recognition: You may be eligible for licensure by universal recognition if you have been licensed as a behavior analyst for a year or more in another state or territory, have never had a license revoked or suspended, do not have an open complaint against a license, and have established residence in Arizona. Proof of Arizona residence and official or certified verification of all licenses you hold or have ever held will be required. Please see the full list of requirements on the first page of the application.

Please note, BCBA certification is a national certification, and not a state license. Only a little over half of US states license behavior analysts. Even if you have been BCBA certified for a number of years, if you are

not actively licensed in another state for at least one year, you are not eligible to apply for licensure by universal recognition.

You can download the applications from our website. To do this, choose the “FORMS” tab in the horizontal menu, then choose BA APPLICATIONS. Once on the BA Applications page, select the appropriate application for your circumstances.

4. DO YOU HAVE AN ONLINE APPLICATION?

No, we do not. All applicants must submit the appropriate PDF application by email or by mail along with a check or money order for the \$350 application fee.

5. WHAT ARE THE REQUIREMENTS FOR LICENSURE? HOW DO I KNOW IF I QUALIFY TO BE LICENSED?

There are many detailed requirements and they are all set forth in Statute and Rule. You can find the Board’s statutes and rules on its website, <https://psychboard.az.gov>, under the “Statutes and Rules” tab. Specifically, A.R.S. §32-2091.02 and §32-2091.03 pertains to education and training requirements.

For Board Rules, which further define the Statutes, choose the BEHAVIOR ANALYST RULES link. This is a PDF document you can download. Specifically, Sections R4-26-404.1 and R4-26-404.2 pertains to licensure.

6. WHAT KIND OF DEGREE DO I NEED?

As noted above, this question is best answered in R4-26-404.1. For an individual who was certified by the BACB after January 1, 2015, the degree must be in one of the following:

- Behavior analysis
- Education
- Psychology
- Or another subject area related to behavior analysis or;
- A degree program in which the applicant completed a BACB-approved course sequence.

7. WHAT IS A VERIFICATION?

Verifications are evidence of your education, training and preparation for practicing independently. Verifications are documents that verify an applicant’s professional history. The documents must be submitted directly to the Board office from the primary source. You tell us your professional history in your application – your education, training, supervised experiences, other licenses, certifications, exams taken, etc. Verifications document the validity of your statements via the custodian of those records, or in other words, the primary source for that specific information.

Your college or university is the primary source for your official transcript. Your supervisors/sites are the primary sources for your supervised experiences. The Behavior Analyst Certification Board is the primary source for your National Exam score. The issuing Board is the primary source for other licenses or certifications.

8. CAN THE BOARD ACCEPT E-MAILED OR FAXED VERIFICATIONS?

Yes, as long as Board staff can track that the verification has been sent directly from the primary source. If a verification is sent by fax, a cover sheet bearing the facility’s logo or letterhead is required. Verifications

are most commonly received by email. An email address for the licensing specialist is at the top of each verification form, and also in the contact information on page 2 of the application.

If verifications are sent by mail, the return address must be the verifier's. If you are providing self-addressed stamped envelopes to your supervisors, make sure the return address on the envelope is your supervisor's, not yours. We will reject all verifications that cannot be tracked as coming directly from the primary source.

9. HOW IS MY EDUCATION VERIFIED?

The Board receives, directly from the educational institution, official transcripts to verify an applicant's education. The applicant must request that the educational institution submit all official graduate transcripts directly to the Board office. The Board does not need undergraduate transcripts. However, any and all graduate degrees should be listed on the application and transcripts sent to the Board's office.

10. I DID A MASTERS IN A NON-BEHAVIOR ANALYST RELATED FIELD. DO I NEED TO SEND THE TRANSCRIPT FOR THIS?

If it was graduate coursework, even if it did not lead to a degree, the applicant must list it on the application and have the transcript sent to the Board office. The statutes do not limit this requirement to only behavior analysis-related coursework or degrees. The limit is simply on graduate vs. undergraduate coursework.

11. I HAVE AN OFFICIAL TRANSCRIPT IN MY SCHOOL'S SEALED ENVELOPE. CAN I INCLUDE THIS WITH MY APPLICATION?

Yes, as long as it has never been opened and is in its original, sealed envelope. If it appears to have been tampered with, we will not accept it.

12. MY SCHOOL OFFERS TO SEND TRANSCRIPTS DIGITALLY. IS THIS ACCEPTABLE TO THE BOARD?

Yes, as long as Board staff can authenticate the transcript. Many schools contract with a third party to provide digital transcripts. These digital services usually offer a means of authentication to the receiver, which has been sufficient to meet verification requirements. If authentication cannot be verified, the applicant will be notified and will be required to have an official transcript sent by mail.

13. HOW IS MY SUPERVISED TRAINING VERIFIED?

As of December 12, 2018, your supervisor(s) may submit either the Behavior Analyst Certification Board's BACB Experience Verification form(s) you used to demonstrate your qualifications for BCBA™ certification, or your supervisor(s) may submit the Arizona Board's Supervised Work Experience or Independent Fieldwork Verification form included in the application packet. Either form of verification must be sent directly to the Board from the supervisor(s). Verifications included in applications will be rejected.

14. HOW MANY SUPERVISED HOURS DO I NEED FOR LICENSURE?

All applicants are required to have a minimum of 1,500 hours of supervised work experience or independent fieldwork.

Arizona does not recognize the supervised hours in the same way that the BACB recognizes the hours. The Arizona Board recognizes an hour for hour equivalent only.

For example, 500 hours of intensive practicum counts as 500 hours of supervised experience – an applicant would need to obtain an additional 1,000 hours in order to meet Arizona’s supervised work experience or independent fieldwork requirement. This is the case even if the BACB accepted 500 intensive practicum hours to be equivalent to 1,500 hours.

15. IS IT REQUIRED THAT MY SUPERVISOR BE LICENSED?

Per Arizona Administrative Code R4-26-404.2(C)(4), The Board shall accept, for the purpose of licensure, hours of supervised experience only if the supervisor was licensed by the state in which the supervision occurred during the period of supervised experience. Your supervisor must also be certified by the BACB and meet the BACB’s supervisor requirements prior to the start of the supervised experience.

If the state in which the supervision occurred does not offer licensure, then requirement for licensure is waived. The supervisor must answer “no” to question 9 on page 2 of the verification form if the state in which supervision takes place does not offer licensure. Remember, BCBA certification is NOT the same as state licensure.

16. IF MY SUPERVISION IS BEING DONE REMOTELY AND MY SUPERVISOR IS IN A DIFFERENT STATE, IN WHICH STATE IS THE SUPERVISION OCCURRING?

The Committee on Behavior Analysts (Committee) and the Board have consistently interpreted the location of supervision under R4-26-404.2(C)(4) to be the state in which the supervised experience is being conducted, or in other words, the location of the supervisee, not the supervisor. Recently, the Committee reiterated this interpretation on July 8, 2019. The Committee stated that “supervision is inclusive of all activities of a supervised experience, which occurs where the supervisee is located; supervised experiences in Arizona require that the supervisor be licensed in Arizona, regardless of the state in which the supervisor is located” (psychboard.az.gov, Committee on Behavior Analysts Meeting Minutes, July 8, 2019, page 3). If the supervisor is in Alaska, and the supervisee’s experience setting is in Texas, a state that offers licensure for BAs, the supervisor must hold a license in Texas during the entire supervised experience for the supervised hours to meet Arizona requirements for licensure.

17. HOW IS MY BCBA® CERTIFICATION VERIFIED?

The Board receives this information via the BACB’s online Registry.

R4-26-404 states, “*To be licensed as a behavior analyst in Arizona, an individual shall take and pass the examination administered by the BACB for Board Certified Behavior Analysts as part of its certification process.*” The BACB requires that a candidate pass the exam before being granted BCBA® certification. Therefore, if an applicant is BCBA® certified, as verified by BACB’s online Registry, the applicant is considered to have passed the exam. To verify this, Board staff obtains information from BACB’s online Registry.

BACB does not have information in their registry for expired BCBA® certifications. If an applicant is no longer BCBA® certified, at the time their application for licensure is submitted, the applicant will need to request a verification letter from BACB be sent to the Arizona Board of Psychologist Examiners verifying that the applicant passed the BACB’s national exam.