



STATE OF ARIZONA  
BOARD OF PSYCHOLOGIST EXAMINERS  
1740 WEST ADAMS STREET, SUITE 3403  
PHOENIX, AZ 85007  
PH: 602.542.8162 FX: 602.542.8279  
WEBSITE: [WWW.PSYCHBOARD.AZ.GOV](http://WWW.PSYCHBOARD.AZ.GOV)

KATIE HOBBS  
Governor

HEIDI HERBST PAAKKONEN  
Executive Director

*Sent USPS Regular & Certified Mail #70212720000061826888*  
*Also sent by email to:* [REDACTED]

November 14, 2023

Amada Tro, M.S.  
[REDACTED]  
[REDACTED]

**RE: NOTICE OF DENIAL OF APPLICATION FOR RENEWAL**

Dear Ms. Tro:

At a public meeting held on November 3, 2023, the Arizona Board of Psychologist Examiners ("Board") considered your application for renewal of your licensure as a licensed behavior analyst and your request to withdraw your application for renewal. Despite having been noticed, you did not appear. After having considered all of the evidence, the Board voted to deny your request to withdraw your application for renewal and to deny your application for renewal.

The factual basis for the denial of your application includes:

1. Respondent was first licensed as a behavior analyst in December of 2017. On April 1, 2019, at her request, Respondent's license was approved and placed on inactive status. On March 13, 2023, Respondent submitted an application to the Board to reactivate her inactive license.
2. Respondent answered "YES" to question no. 6 of the application that reads: "Since the last license period, have you had a professional license, certification or registration refused, revoked, suspended, or restricted in any regulatory jurisdiction(s) for reasons relating to unprofessional conduct? If yes, please explain."
3. Respondent disclosed that in 2021, the Behavior Analyst Certification Board ("BACB") revoked her BCBA certification. However, Board Staff discovered that Respondent failed to properly disclose on her licensure renewal application, submitted on or about February 1, 2021, that she was notified in December of 2020 she was under investigation by the BACB.
4. According to documentation received by the BACB, Respondent's certification was revoked because Respondent signed and approved an individual's Competency Assessment without meeting the individual or observing the individual demonstrate the skills required to determine competency in the field. In addition, Respondent backdated the Competency Assessment. In doing so, it was determined that Respondent violated several

provisions of the Professional and Ethical Compliance Code for Behavior Analysts, including 1.04 (Integrity); 5.02 (Supervisory Volume); 5.04 (Designing Effective Supervision and Training); 5.07 (Evaluating the Effects of Supervision); 10.01 (Truthful and Accurate Information Provided to the BACB); and 10.05 (Compliance with BACB Supervision and Coursework Standards”. Respondent appealed the revocation of her certification and the appeal was upheld by the Disciplinary Appeal Committee of the Behavior Analyst Certification Board with the Committee noting “the consequences were appropriate given the potential public harm by your signing off on an assessment of an individual you have never met or assessed. BACB certificants often provide services to highly-vulnerable clients. Client protection warranted the severity of the consequences.”

5. On the same licensure renewal application submitted on or about February 1, 2021, question no. 9 asks “Since the last license period, have you been investigated by any professional organization, health care institution, provider panel of which you are a member or staff, or a regulatory agency in any jurisdiction, including the Arizona Board of Psychologist Examiners, concerning the ethical propriety or legality of your conduct?” Respondent answered “NO” to this question despite the BACB Notice of Allegations being dated December 4, 2020 and Respondent submitting her answer to the Notice of Allegations on January 19, 2021, approximately two weeks before she submitted her application for renewal of her inactive license.
6. Finally, on the March 2023 application for renewal, Respondent failed to disclose that she was also currently licensed in the State of New York. When asked by Board Staff whether she had notified New York of the BACB investigation and ensuing certification revocation, Respondent stated “I will let NY State Education Department know about the revocation when I need to renew my license”.
7. The Committee on Behavior Analysts met on April 28, 2023, to consider Respondent’s application for renewal of her inactive license. Respondent did not appear at the meeting but during the meeting, she did email Board staff and requested that her application for renewal be withdrawn.

Pursuant to A.R.S. §32-2091.02(A)(5), an applicant for licensure must not have committed any act or engaged in any conduct that would constitute grounds for disciplinary action against a licensee. The Board found that you committed the following violations constituting acts of unprofessional conduct: A.R.S. §32-2091(12)(c), which is making or using statements of a character tending to deceive or mislead; (12)(m), which is using fraud, misrepresentation or deception to obtain or attempt to obtain a behavior analysis license; (12)(n), which is unprofessional conduct in another jurisdiction that resulted in censure probation or a civil penalty or in the denial, suspension, restriction or revocation of a certificate; and (12)(dd), which is violating an ethical standard adopted by the board as it relates to the BACB’s Professional and Ethical Compliance Code for Behavior Analysts. Pursuant to the Disciplinary Appeal Committee of the BACB, Respondent violated the following provisions:

- a. 1.04 –Integrity (now 1.01)
- b. 5.02 –Supervisory Volume (now 4.03)
- c. 5.04 --Designing Effective Supervision and Training (now 4.02)
- d. 5.07 –Evaluating the Effects of Supervision (now 4.10)
- e. 10.01—Truthful and Accurate Information Provided to the BACB (now 1.16)
- f. 10.05—Compliance with BACB Supervision and Coursework Standards (now 4.01)

### **NOTICE**

#### **Notice of Appealable Agency Action. Right to Hearing on Denial of Application for Re-Licensure**

Pursuant to A.R.S. § 41-1092.03, you have the right to appeal the denial of application for licensure by requesting a hearing. To obtain a hearing, you must submit a written request for a hearing to the Arizona Board of Psychologist Examiners, 1740 West Adams St., Suite 3403, Phoenix, Arizona, 85007. Pursuant to A.R.S. §41-1092.03(B) the request for hearing must be received at the Board's office within thirty-five (35) calendar days of the date of this Notice. The request must state your name, your address, the action being appealed (denial of licensure), and must contain a concise statement of the reasons for the appeal. The hearing will be held within sixty (60) calendar days after the Board receives your request for hearing (A.R.S. § 41-1092.05(A)) At the hearing, you will have the burden of proof to demonstrate that you are qualified for re-licensure regarding the matters set forth in this Order of Denial of Application for Renewal of License. The Office of the Attorney General will represent the State of Arizona at the hearing.

Please contact me if you have questions: [heidi.paakkonen@psychboard.az.gov](mailto:heidi.paakkonen@psychboard.az.gov) or 602-542-3018.

Sincerely,



Heidi Herbst Paakkonen, MPA  
Executive Director

Sent to address of record to:  
Amada Tro, M.S.

Sent interagency mail to:  
Jeanne Galvin, Assistant Attorney General