



STATE OF ARIZONA
BOARD OF PSYCHOLOGIST EXAMINERS
1740 WEST ADAMS STREET, SUITE 2430
PHOENIX, AZ 85007
PH: 602.542.8162
WEBSITE: psychboard.az.gov

KATIE HOBBS
Governor

HEIDI HERBST PAAKKONEN
Executive Director

Sent USPS Regular & Certified Mail #9586 0710 5270 1957 6198 54

Also sent by email to: [REDACTED]

April 15, 2025

Raegan Gould, BCBA
[REDACTED]

RE: NOTICE OF DENIAL OF APPLICATION FOR TELEHEALTH REGISTRY

Dear Ms. Gould:

At its public virtual meeting held on April 4, 2025, the Arizona Board of Psychologist Examiners ("Board") considered your application for telehealth registry pursuant to Arizona Revised Statutes ("A.R.S.") § 36-3606. You appeared personally and on your own behalf. After having considered the application, all supporting documentation, your testimony, and results of the Board's investigation, the Board voted to deny your application for the telehealth registry.

The factual basis for the denial of your application includes:

1. On March 10, 2025, you submitted an application for the Telehealth Registry, which allows for out-of-state licensed behavior analysts to provide direct services to a client located in Arizona.
2. Pursuant to A.R.S. §36-3606, a healthcare provider who is not licensed in this state may provide telehealth services to a person located in this state if the healthcare provider satisfies the statutory requirements set forth in A.R.S. §36-3606. One of those requirements includes providing proof of their current, valid and unrestricted license to practice in another state that is substantially similar to a license issued in this state to a comparable health care provider and that is not subject to any past or pending disciplinary proceedings in any jurisdiction.
3. The Board's investigation revealed that you do not hold a current, valid and unrestricted behavior analyst license in any other state or U.S. jurisdiction. On your application you incorrectly asserted that "As a Board Certified Behavior Analyst (BCBA), I acknowledge that my certification granted by the Behavior Analyst Certification Board (BACB) provides me with the authority to practice in all U.S. states that recognize and regulate behavior analysis." This is a misrepresentation of the scope of authority conveyed as a result of certification by the BCBA.

4. On your application you listed your residential address as [REDACTED]. A.R.S. §36-3606 (telehealth registry) presumes applicants do not reside in Arizona. In response to Board staff's request for clarification with respect to your residence, on March 14, 2025, you supplied a [REDACTED] address as your residential home, indicating that this was your correct mailing address. These representations are inconsistent.
5. The email address you provided on your application was: [REDACTED]. During a March 10, 2025, phone conversation with Board staff, you acknowledged that this was not your email address and provided Board staff with the correct information. During your appearance before the Board, you again acknowledged that the email provided on the application was not your email.
6. On March 14, 2025, you emailed your responses to questions posed by Board staff, namely: "Did you complete the entirety of your application? If not, who did? Did another person prepare any of the application's content?" you responded: "Yes, I personally completed the entirety of my application, ensuring that all responses were accurate." The Board's investigation, including your subsequent admissions, revealed that this was a false statement.
7. On March 27, 2025, Board staff received the following email from JM, who is the Manager of Credentialing for Ideal Billing and Consulting: "I am reaching out regarding the Telehealth Registry License application we submitted for our BCBA provider. We now wish to cancel and withdraw the application because our provider is not yet fully licensed, and we would like to first complete the full licensing process before reapplying. Could you please guide me on the process for withdrawing the application and any associated requirements or possibilities? Your cooperation in this matter would be greatly appreciated."
8. Your application was reviewed by the Board's Committee on Behavior Analysts ("Committee") at their virtual public meeting on March 31, 2025, in which you made inconsistent statements relative to who prepared the application. You also denied ever having provided behavior analytic services (including supervision) into Arizona. After deliberation, the Committee unanimously recommended that the Board deny your application based on your failure to meet all of the requirements set forth in A.R.S. §36-3606.
9. During your April 4, 2025, appearance before the Board, you repeatedly acknowledged that, in fact, you did collaborate with a third party to prepare and submit your application. These admissions contradict your previous representations to the Board.
10. After consideration of all of the information, the Board voted to accept the Committee's recommendation to deny your application.
11. A.R.S. §36-3606(C) provides that a health care provider who fails to comply with the applicable laws and rules of this state is subject to investigation and both non-disciplinary and disciplinary action by the applicable health care provider regulatory board or agency in this state.

Given the foregoing, the Board voted to deny your application for Telehealth Registration based upon your failure to demonstrate that you meet the requirements as set forth in A.R.S. §36-3606(A)(4) failure to hold a current, valid and unrestricted license to practice in another state that is substantially similar to a license issued in this state to a comparable health care provider. The Board also found that you violated A.R.S. §36-3606(A)(5) in that you failed to act in full compliance with all applicable laws and rules of this state as it relates to: A.R.S. §32-2091(12)(c), making or using statements of a character tending to deceive or mislead; A.R.S. §32-2091(12)(j), making a fraudulent or untrue statement to the board or its investigators, staff or consultants; A.R.S. §32-2091(12)(k), violating any federal or state laws or rules that relate to the practice of behavior analysis or to obtain a license to practice behavior analysis; and A.R.S. §32-2091(12)(m), using fraud, misrepresentation or deception to obtain or attempt to obtain a behavior analyst license or to pass or attempt to pass a behavior analysis licensing examination or in assisting another person to do so.

NOTICE

Notice of Appealable Agency Action. Right to Hearing on Denial of Application

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 2430, 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 Order. The request must state your name, your address, the action being appealed (denial of telehealth registry), 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 the telehealth registry. The Office of the Arizona Attorney General will represent the State of Arizona at the hearing.

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

Sincerely,



Heidi Herbst Paakkonen, MPA
Executive Director

Sent by email to:
Jeanne Galvin, Assistant Attorney General