



## Applied Behavior Analysis (ABA) Provider Disclosure Form

UPDATED: January 2025

### Contacting ORL

If you'd like to write us, please use our mailing address, which is:

Organization for Research and Learning, Inc.

3815 S Othello St.

Suite 100, Box 361

Seattle, WA 98118

You can also contact Kelly Ferris, ORL's Compliance Officer at 206-427-7696, and she'll direct your call to the appropriate staff member.

If you'd like to email any of us, our email addresses use the convention:

firstname.lastname@o4rl.com

(please note that the character in the first part of our domain name is the letter "o" and not the number "0")

For example, if our staff member's name was Nathan Hernandez, you could reach them at [nathan.hernandez@o4rl.com](mailto:nathan.hernandez@o4rl.com).

You can also reach out to our compliance team, which can be reached by emailing them at [compliance@o4rl.com](mailto:compliance@o4rl.com) and they'll do their best to address your concerns.

## **STATE OF WASHINGTON REQUIRED DISCLOSURE STATEMENT**

Washington state law requires that we inform you that mental health service providers must be credentialed with the Washington State Department of Health for the protection of the public's health and safety and to empower the citizens of Washington by providing a complaint process against those providers who would commit acts of unprofessional conduct.

All of ORL's clinical staff members hold appropriate and required credentials from Washington's Department of Health. Towards the end of this document, we've listed the names of each of our clinical staff members and their Washington Department of Health credential number to help you easily identify the staff member should you feel like you ever need to file a complaint.

### **Clients are not liable for any fees or charges for services rendered before they first received a version of this disclosure statement.**

You first received this ABA Provider Disclosure Form when we admitted your child for ABA services. You received this disclosure statement when we sent you our contract, and you acknowledged that you received this statement when you signed that contract. We also periodically send you an updated version of this disclosure statement at various times during each year when we send you your child's monthly ABA services invoices.

This is your copy of ORL's most recently updated ABA provider disclosure statement. Please keep this copy for your records and reference. You can also always access the most recently published version of this disclosure statement through the hyperlink we provide at the bottom of the email we send out monthly with your ABA services invoice or on [the Clients page](#) of ORL's website.

You can also request an updated or replacement copy of this disclosure form at any time by contacting a professional staff member from your child's ABA treatment team or by reaching out to Kelly Ferris at (206) 930-1548 or emailing Kelly at [kelly.ferris@o4rl.com](mailto:kelly.ferris@o4rl.com).

### **ORL's Therapeutic Approach**

You have the right and the responsibility to choose a treatment modality that best meets the needs of you and your child. ORL's therapeutic approach is Applied Behavior Analysis (ABA) and everything that we do with your child is based on or directly taken from the discipline of behavior analysis. We only practice Applied Behavior Analysis and we don't practice any other discipline or use any other therapeutic approach.

Applied Behavior Analysis (ABA) is the application of procedures based on the principles of behavior analysis. ORL then systematically applies those procedures to improve socially

significant behavior to a meaningful degree and (where feasible and appropriate) to demonstrate empirically that the procedures we used were responsible for the improvement in behavior.

ORL will develop and monitor an ABA intervention program for your child based on the principles of Applied Behavior Analysis. The clinical staff members of ORL deliver behavior analysis services and do not practice any other disciplines, including: psychology, counseling, speech-language pathology, or occupational therapy.

ORL's staff members are not qualified to diagnose and do not diagnose mental health disorders or conduct psychotherapy. All ORL clinical staff members hold a behavior analysis credential commensurate with their educational and experiential backgrounds. Professional staff hold either a Licensed Behavior Analyst (LBA) or Licensed Assistant Behavior Analyst (LABA). Paraprofessional staff (such as ABA Therapy Assistants and Behavior Technicians) hold the credential of Certified Behavior Technician (CBT). All of the credentials our staff hold are issued by the Washington State Department of Health, the Behavior Analyst Certification Board, or both.

### **Training and Education**

ORL believes in delivering high quality ABA intervention. Therefore, our standards for professional staff experience exceed the practice requirements of the Behavior Analyst Certification Board (BACB), The [Consumer Guidelines for Behavior Analysts working with Individuals with Autism](#), and Washington State's Department of Health requirements.

For more information on the BCBA certification please visit the Behavior Analyst Certification Board website at [www.bacb.com](http://www.bacb.com).

As part of our high quality intervention, ORL elects to assign several professional staff members to each client's case (for example, Clinical Services Supervisors, Consultants, and Program Managers).

A Clinical Services Supervisor (CSS) staff member supervises each case. All CSSs have a minimum of 10 years of post-graduate experience delivering behavior analytic services to individuals with autism and are Licensed Behavior Analysts (LBA) with Washington State Department of Health (DOH).

Our Consultants have a minimum of 7 postgraduate years of experience delivering services to individuals with autism, and are Licensed Behavior Analysts or Licensed Assistant Behavior Analysts (LABA) with Washington State (DOH).

Program Managers have a minimum of 3 years experience delivering services to individuals with autism, hold, and are Licensed Behavior Analysts or Licensed Assistant Behavior Analysts with Washington State DOH.

In addition, all professional staff members who supervise the work of clinical staff receive training in strategies and techniques for providing effective clinical supervision in line with the BACB's guidelines for clinical supervision training and in accordance with [WAC 246-341-0515](#).

In addition to professional staff, clients will likely be assigned therapy assistants/behavior technicians to deliver direct ABA services under the supervision of a professional staff member. These therapy assistants/behavior technicians staff are paraprofessional staff members who typically hold Certified Behavior Technician (CBT's) licenses with Washington State's Department of Health and work under direct supervision of Licensed Behavior Analysts and Licensed Associate Behavior Analysts, per [WAC 246-805-330](#).

Additionally, all staff:

- Pass criminal records checks before starting to work with clients consistent with chapter [RCW 43.43.830](#). We then complete new criminal records checks on all of our employees at least once every two years.
- Meet staffing requirements outlined in [WAC 246-341-0515](#) and in alignment with requirements of [WAC 246-341-0728](#)
- Hold appropriate credentials to provide behavior analytic services in alignment with [WAC 246-805-010 thru WAC 246-805-410](#)
- Have been checked against the list of excluded individuals/entities (LEIE) searchable database (found on the [Office of Inspector General for the U.S. Department of Health and Human Services website](#)) for each employee who provides clinical services to clients at the time of hire and then every two years throughout their employment

## **A Special Note About Licensed Assistant Behavior Analysts (LABA's)**

Several of ORL's professional staff members who help oversee some of our client's ABA services hold the credential of Licensed Assistant Behavior Analysts (LABA's) with Washington State's Department of Health. State regulations require that the clinical work that LABA's perform be supervised by Licensed Behavior Analysts (LBA's). You can tell which ORL staff members are LABA's by looking for the credential "LABA" in the table that lists all of our clinical staff members at the end of this document. You can also tell whether an individual is a LABA by looking at their state license number, which will start with the letters "AB" as in "AB60764973".

Any LABA who works for us has a formal, signed supervision agreement on file with each of the Licensed Behavior Analysts (LBA's) who supervise their work in accordance with [WAC 246-805-240](#). In addition, if a LABA works with your child, you will find a statement in your child's ABA treatment plan that clearly states which ORL staff person working with your child is an LABA and which LBA supervises the clinical work that person does with your child. You can find that statement in the "Roles and Responsibilities" section of your child's ABA Treatment Plan, which is usually located towards the end of the document. While you should receive a copy of each of your child's ABA Treatment Plans, if you ever need another copy please just ask any ORL Clinical Services Supervisor, Consultant, or Program Manager and they will get another copy for you.

## **Professional and Ethical Conduct Standards**

We hold all of our professional staff members (that would be our Clinical Services Supervisors, Consultants, and Program Managers) to the standards outlined in the [Ethical Code for Behavior Analysts](#) published by the Behavior Analyst Certification Board. Our professional staff receive annual, ongoing training in topics related to ethics and professional conduct and the amount of training they receive each year exceeds the standards set by both the Washington State Department of Health and the Behavior Analyst Certification Board.

We also hold all of our paraprofessional staff members (that would be our ABA Therapy Assistants and Behavior Technicians) to the standards outlined in the [Ethics Code for Behavior Technicians](#) published by the Behavior Analyst Certification Board.

## **Complaints and Grievances**

Parents and clients have the right to have their concerns heard and addressed in a timely manner and to participate in the process of resolving those concerns where appropriate. To that end, ORL offers the following avenues to share concerns, complaints and grievances you may have.

**Concerns related to clinical services:** All concerns related to the specific clinical content of a client's ABA program including implementation of that program (for example, staffing concerns) should be directed to the Consultant on the team. You should feel free to bring up these concerns (1) in person during regularly scheduled program supervision sessions, (2) by phone, or (3) by email.

Should the Consultant be unable to address a clinical concern to your satisfaction, the Consultant will notify the Clinical Services Supervisor. Should the Clinical Services Supervisor be unable to address a clinical concern to your satisfaction, a second Clinical Services Supervisor who has no direct involvement with the team will be consulted.

**Concerns related to payments or funding:** Concerns related to payment for services or third-party funding (such as insurance coverage for ORL's ABA services) should be directed to your child's Clinical Services Supervisor who may elect to direct the concern directly to the funding source.

**Concerns related to ethics, privacy, compliance, or security:** If you have any concerns about an ethical issue, an issue related to the privacy of your child's information, an issue related to a compliance matter, or a concern related to how we protect your child's information, we encourage you to use [our anonymous complaint form](#). You can access that form by either [clicking here](#) or through [ORL's client page](#).

You can also raise any concerns you have directly with your child's Clinical Services Supervisor, Consultant, or Program Manager. For any privacy, security, or general compliance concerns you might have, you can also contact ORL's Privacy Officer, Kelly Ferris. You can reach Kelly at (206) 427-7697, or [by email](#).

**Concerns related to the professional practice of behavior analysis:** Should you or your child wish to complain about the professional practice of ORL's staff members, they may [contact the Behavior Analyst Certification Board™](#) to register such a complaint so long as the ORL staff member is certified by the Behavior Analyst Certification Board™ at the time you wish to enter such a complaint. The Behavior Analyst Certification Board™ offers a wealth of information on its website related to how to report ethical or professional conduct concerns or violations, the process the Board goes through to receive and investigate allegations, the timelines for those processes, and the possible outcomes and consequences associated with investigation of alleged professional or ethical conduct violations.

In addition to registering a complaint with the Behavior Analyst Certification Board™, if you believe that your rights have been violated, you also have the right to [file a complaint with the Washington State Department of Health](#), which issues the Licensed Behavior Analyst (LBA), Licensed Assistant Behavior Analyst (LABA), and Certified Behavior Technician (CBT) credentials to our clinical staff.

If you have any concerns about the privacy or security of the health information we create, maintain, or transmit about your child, you can also file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights by sending a letter to:

200 Independence Avenue, S.W.

Washington, D.C. 20201

or by calling 1-877-696-6775 or by [visiting this website](#)

## Clients' Rights

A rule in Washington ([WAC 246-341-0600](#).) states that as a client of ORL, you and your child have certain rights. We first notified you of these rights in the contract for ABA services that you signed before your child started receiving ABA services from us. We'd like to remind you of those rights here.

You and your child's rights include things such as the right to:

- (a) Receive services without regard to race, creed, national origin, religion, gender, gender expression, sexual orientation, age or disability;
- (b) Practice the religion of your choice as long as that practice does not infringe on the rights and treatment of others or the treatment service. Individual participants have the right to refuse participation in any religious practice;
- (c) Be reasonably accommodated in case of any sensory or physical disability you may have, any limitation in communication abilities you may have, any limited English proficiency, and any cultural differences;
- (d) Be treated with respect, dignity, and privacy, except that staff may conduct reasonable searches to detect and prevent possession or use of contraband on the premises;
- (e) Be free of sexual harassment;
- (f) Be free of exploitation, including physical and financial exploitation;
- (g) Have all clinical and personal information treated in accord with state and federal confidentiality regulations;

(h) Review your clinical record in the presence of the administrator or their designee and be given an opportunity to request amendments or corrections;

(i) Receive a copy of agency grievance system procedures upon request and to file a grievance with the agency, or behavioral health organization (BHO), if applicable, if you believe your rights have been violated; and

(j) File a complaint with the department when you feel the agency has violated a WAC requirement regulating behavioral health agencies.

You (or in some instances) your child may suspend or refuse to implement any and all recommendations or instructions made by ORL and may withdraw from intervention at any time without prejudice or penalty.

### **Confidentiality**

All issues discussed in the course of ABA treatment are confidential. We will generally only release information regarding your child's treatment consistent with state and federal law. However, the laws of Washington require that we release certain information in specific situations, such as: suspicions of abuse of a child or elder; suspicions of possible imminent harm to you or others; or in response to a court subpoena. This is explained further in ORL's [Notice of Privacy Practices](#), which you first received when we began serving your child and which we send you periodically along with your child's monthly ABA services invoices.

In the case of group treatment, treatment provided outside of your home (such as in school settings or other community settings), or other similar situations please understand that we can't guarantee the confidentiality of your child's information. Other risks to confidentiality may happen when you choose to use a cell phone or email our staff.

As professionals in the field of behavior analysis, ORL seeks supervision and consultation from other professionals to ensure we provide the highest quality of services to you and your child and to facilitate the professional development of our staff. All of the consultants who work with us agree to maintain the confidentiality of all of our clients and their families

Kelly Ferris is ORL's Privacy Officer and she's available if you ever have any questions about our [Notice of Privacy Practices](#) or any of our confidentiality or privacy policies or practices. You can reach Kelly by email at [kelly.ferris@o4rl.com](mailto:kelly.ferris@o4rl.com), or by phone at (206) 427-7697.



## ORL's Staff Members

The following is a list of current clinical staff employed by ORL along with their credentialing information. You should use this information if you wish to file a complaint about one of us with any regulatory agency including Washington's Department of Health, or the Behavior Analyst Certification Board.

When one of our staff members holds a credential under their legal name, but they more commonly go by another name we've listed both for you. If you wish to file a complaint against any of our staff members, you should be sure to use the name they hold their credential under.

## ORL's Professional Staff Members:

<b>Staff Member</b>	<b>Washington State Dept. of Health License Number</b>	<b>Behavior Analyst Certification Board Credential Number</b>
Brandi Allred, M.Ed., BCBA, LBA	BA60763001	1-14-15609
Brenda Taylor, BCaBA, LABA	AB61310984	0-22-14155
Kelly Ferris, M.Ed., BCBA, LBA ORL's Privacy & Security Officer	BA60760213	1-03-1282
Krishna Lakhani, M.S., BCBA, LBA	BA61553890	1-24-72475
Meaghan Kemp, M.A., BCBA, LBA	BA60761977	1-16-22482
Michael Fabrizio, M.A., BCBA, LBA, CCEP, CHC, CHPC, CHPSE	BA61099801	1-22-61098
Emily Sturdivant, M.A., BCBA, LBA	BA61151362	1-21-47128
Linnea Eldred, M.S., BCBA, LBA	BA61507743	1-23-68808

**ORL's ABA Therapy Assistants/Certified Behavior Technicians:**

<b>Staff Member</b>	<b>Washington State Dept. of Health License Number</b>	<b>Behavior Analyst Certification Board Credential Number</b>
Clare Milby, CBT	CB61559068	N/A
Erik Sundquist, CBT	CB61446848	N/A
Helen Cross, CBT	CB61581313	N/A
Kathryn (Katie) Peterson, CBT	CB61417061	N/A
Ken Lockwood, CBT	CB61522059	N/A
Louis Molyneux, CBT	CB61559068	N/A
Nadia Williams, CBT	CB61535510	N/A
Nhi Lau, CBT	CB61595320	N/A
Sheila Perkow, CBT (commonly known as Apollo Perkow)	CB61625851	N/A
Sofia Weil, CBT	CB61498586	N/A
Sonja Lee, CBT	CB61603494	N/A
Tziporah Maslow, CBT	CB61601946	N/A
Velinda Firstianto, CBT	CB61438291	N/A