



# RNAO

Registered Nurses' Association of Ontario  
L'Association des infirmières et infirmiers  
autorisés de l'Ontario

Thomas Corcoran  
Chair  
Health Professions Regulatory Advisory Council (HPRAC)  
56 Wellesley Street West, 12th Floor  
Toronto, ON M5S 2S3

December 12, 2017

Dear Mr. Corcoran,

Thank you for your letter of December 1, 2017 inviting the Registered Nurses' Association of Ontario (RNAO) to provide feedback on Applied Behaviour Analysis (ABA) by December 12, 2017.

Due to the short timeframe related to this submission, RNAO is unable to provide a comprehensive response informed by evidence from the academic literature and our expert members working in a variety of sectors.

We cannot speak to the specific risk of harm by client population of ABA treatment, yet it would appear that those living with neurocognitive disorders, autism spectrum disorder, attention deficit hyperactivity disorder, and dementia are more at risk of harm due to their spectrum of disorder and unpredictability when experiencing triggering events. Co-morbidity with other health mental health issues, such as anxiety in individuals living with autism, can pose additional challenges with emotional dysregulation.

Our initial impression is that oversight mechanisms of ABA would be helpful to prevent harm. Appropriate to the practice setting, it would be important to identify treatment risk, variance, goal identification, and measurement of desired outcomes.

If a decision is taken to regulate ABA, it would be critical that the nurse practitioners and registered nurses who are already certified in ABA and/or experienced with the complexity and volatility of behavioural management through their educational and clinical expertise have their competency regulated by the College of Nurses (CNO). As with psychotherapy, ABA is another potential modality that can benefit the public by those with the appropriate knowledge, skills, and abilities to be competent.

In order not to duplicate the ongoing access issues with ABA as have been experienced with psychotherapy, RNAO urges HPRAC and CNO to engage with RNAO and experienced nursing clinicians as soon as possible in the process.

With thanks and warm regards,

A handwritten signature in black ink that reads "Doris Grinspun". The signature is written in a cursive style and is underlined with a long, horizontal stroke.

Doris Grinspun, RN, MSN, PhD, LLD(hon), O.ONT  
Chief Executive Officer, RNAO

cc: Anne Coghlan, ED and CEO - CNO