

## **VCS Coordinator Coursework Attestation FAQs**

On September 16, 2021, the BACB provided a new option for BCBA-certified VCS Coordinators to review applicants' coursework to determine whether they have met all of the relevant coursework requirements. If a VCS Coordinator determines that an applicant has met the coursework requirements, they may complete a BCBA or BCaBA VCS Coordinator Coursework Attestation and submit it directly to the BACB. This will help the BACB streamline the application-review process.

For more information about this change, please review the following FAQs for VCS Coordinators and applicants.

## VCS Coordinator FAQs

- Q. How do I know whether the applicant met the coursework requirements?
  - First, review the BACB's current coursework requirements, which are located in the BCBA and BCaBA Handbooks and the BCBA and BCaBA VCS Coordinator Coursework Attestations.

Once you are familiar with the coursework requirements, review your university's VCS records. If the applicant took courses that were not part of those records, you must review the syllabi and all relevant instructional materials for those courses. You must then review the applicant's transcript(s) to ensure that each course is listed, and that they took each course for credit and passed.

- Q. Can I use one attestation for all of my students?
  - ▶ No. The VCS Coordinator Coursework Attestation is based on a student's academic record. In other words, one attestation will **not** grant universal approval for the institution, so each one must be completed individually.
- Q. Can I attach several attestations to a single email if I am completing them for multiple students?
  - ▶ No. We must receive the attestation in a single email with the BACB ID of the student in question in order to process it.
- Q. Can I just review a few courses and agree that the applicant met parts of the requirements (e.g., I agree that they met the Behavior Assessment content requirement)?
  - ▶ No. We only accept attestations in which the VCS Coordinator reviewed all of the applicant's materials to confirm they accrued enough hours in all of the required content areas and/or completed a full 5th-edition Verified Course Sequence at the Coordinator's institution.

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- Q. What if the applicant completed some courses at another university?
  - ▶ If you have access to those VCS records or the course syllabi/materials and transcript(s), you may include those courses in the attestation.
- Q. What if the applicant completed some behavior-analytic courses that are **not** part of our VCS?
  - ▶ If you have access to the course syllabi/materials and transcript(s), you may include those courses in the attestation.
- Q. If the applicant did **not** complete any courses from my VCS, can I review their materials and sign the attestation?
  - No.
- Q. What should I do if the applicant already received a coursework evaluation from the BACB?
  - ▶ We recommend using that determination to help evaluate whether they met the coursework requirements. If the BACB determined that the applicant was short in any of the content areas, you can evaluate their training experience to determine whether they took additional courses to cover the deficits in their content allocations. If the BACB determined that the applicant met all of the current coursework requirements, you can use that determination as supporting documentation in the attestation.
- Q. Can I sign the attestation if I am **not** an active VCS Coordinator?
  - ▶ No. We will verify that the VCS Coordinator who signed the form is currently listed in ABAI's Verified Course Sequence Directory and is actively certified as a BCBA.
- Q. Can I sign the attestation if I am **not** an active BCBA?
  - ▶ No. Only BCBA-certified VCS Coordinators can sign the attestation, as they are required to adhere to the BACB's ethics code.
- Q. What if I don't have enough information to sign the attestation?
  - ▶ If you cannot confirm that the applicant met the BACB's coursework requirements or completed a full 5th-edition Verified Course Sequence at your institution, do not complete and sign the attestation. Submitting false or incorrect information to the BACB is an ethics violation and may result in a Notice of Alleged Violation.
- Q. Does the applicant still need to submit official transcript(s) to show that they completed the courses?
  - ▶ Yes. The applicant must submit their official transcript(s) to the BACB as usual. That way, BACB staff can confirm that all of the courses listed in the attestation appear in the transcript(s).
- **Q.** Can another VCS Coordinator cosign the attestation?
  - ▶ No. Only one VCS Coordinator can attest that the applicant met the coursework requirements.
- Q. Can I make my own attestation form?
  - No. You must use the BCBA or BCaBA VCS Coordinator Coursework Attestation.
- Q. Am I only able to review and attest to courses that I taught?
  - ▶ No. You can review all of the behavior-analytic courses that the applicant has taken to determine whether the coursework requirements have been met.

- Q. How will an attestation affect my pass-rate data?
  - Attestations will not affect your pass-rate data, as the current method for assigning pass rates to universities has not changed. If the applicant completed all of their coursework at one institution and in one VCS, their data will be included in the institution's pass-rate data. If the applicant completed mixed coursework at multiple institutions or in multiple sequences at the same institution, their data will not be included in the institution's pass-rate data.
- **Q.** Where can the applicant find their BACB ID number?
  - ▶ The applicant's BACB ID number is located in the Profile tab in their BACB account. Please note that this number must be listed in the attestation accurately. If we cannot locate a corresponding BACB account, the attestation will **not** be included in their application and will **not** be processed.
- Q. How do I submit the attestation to the BACB?
  - You must email the attestation directly to VCSatt@bacb.com from the email address listed in your BACB account.
- Q. Why can't I provide the attestation to my students to submit to the BACB with their application packet?
  - ▶ It is important to verify the authenticity of the attestation, and performing primary source verification is the best way to do so.
- Q. Does the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) prohibit me from submitting the attestation to the BACB?
  - ▶ No. Colleges and universities commonly provide student information to certification and regulatory bodies upon request from a student, so they typically have existing protocols for the release of student information to a third party. If you have not already developed a FERPA release, you may ask your institution's registrar about existing protocols. If your institution does not have such protocols, you may have your students sign a written FERPA release authorizing the disclosure of information to the BACB. FERPA requires that a consent for disclosure of educational records be signed and dated, specify the information that may be disclosed, state the purpose of the disclosure, and identify the party or class of parties to whom the disclosure may be made (34 CFR § 99.30). Your release should also include the educational records (e.g., transcripts) you review to complete the attestation.
- Q. The VCS Coordinator Coursework Attestations say that providing inaccurate information to the BACB is a violation of BACB requirements and ethics standards. How is this a violation?
  - Submitting falsified, forged, or untrue information to the BACB is a violation of the ethics standards in the RBT Ethics Code (2.0) and the Ethics Code for Behavior Analysts, which dictate that behavior technicians and analysts must behave with integrity, be truthful, avoid creating situations that result in others being untruthful, and provide truthful and accurate information to the BACB.

## **Applicant FAQs**

- Q. Who should submit my attestation to the BACB?
  - ▶ Your VCS Coordinator must submit your attestation directly to the BACB from the email address listed in their BACB account. We cannot accept an attestation that is not submitted directly by the VCS Coordinator, so please do not submit your own copy.
- Q. Can my VCS Coordinator submit an attestation for me if I previously submitted coursework that was denied?
  - ▶ It depends. Your VCS Coordinator will review your previous denial in conjunction with any other courses you completed to determine whether they can attest that you met all of the coursework requirements. If they cannot attest, you must complete additional coursework.
- Q. If I took a full 4th edition Verified Course Sequence, can my VCS Coordinator submit an attestation for me under the 2022 requirements?
  - Again, it depends. Your VCS Coordinator can do so if they determine and can attest that you met all of the 2022 coursework requirements or completed a full 5th-edition Verified Course Sequence at their institution.
- Q. Do I need to submit Nonverified Course Content Attestations for courses that are **not** in a VCS if I go this route?
  - ▶ You do **not** need to submit Nonverified Course Content Attestations for courses that have been reviewed by your VCS Coordinator as part of a VCS Coordinator Coursework Attestation.
- Q. Can I have two or more VCS Coordinators fill out and sign my attestation?
  - ▶ No. Only one VCS Coordinator may fill out and sign your attestation.
- Q. Can my VCS Coordinator submit multiple attestations for me?
  - ▶ No. We will only accept attestations in which one VCS Coordinator reviewed all of your materials and ensured that you met all of the coursework requirements or completed a full 5th-edition Verified Course Sequence at their institution.
- Q. Who should review my coursework and sign my attestation if I attended multiple institutions?
  - ▶ We recommend that the VCS Coordinator at the last university you attended completes your attestation, as it may be easier for them to review all of your course materials. However, this is ultimately up to your VCS Coordinators.
- Q. Can my VCS Coordinator who is **not** a BCBA sign my attestation?
  - No. Only BCBA-certified VCS Coordinators may sign your attestation, as they are required to adhere to the BACB's ethics code.
- Q. Can my VCS Coordinator review my international courses?
  - ▶ Yes, as long as they can agree to all of the attestations, meaning that they must have access to those VCS records or the course syllabi/materials and transcript(s).
- Q. What if my VCS Coordinator doesn't want to sign my form?
  - ▶ If we do not receive an approvable VCS Coordinator Coursework Attestation, we will conduct a course-by-course review by comparing your official transcript(s) with ABAI's Verified Course Sequence records and our nonverified coursework database records to determine whether you met all of the coursework requirements.