



Pennsylvania  
**Department of Human Services**  
Office of Mental Health and Substance Abuse Services

April 2, 2026

Dear Intensive Behavioral Health Service (IBHS) Providers,

We are writing to provide updated behavioral health technician/behavioral health technician-applied behavior analysis (BHT/BHT-ABA) training information and to inform all IBHS providers of the training changes the Behavior Analyst Certification Board (BACB) implemented effective January 1, 2026. If your agency utilizes the registered behavior technician (RBT) certification, training components, or qualified trainers, these changes may affect your staff training plans and hiring decisions.

Key Updates in Training Content

- Training content is now referred to as the RBT Test Content Outline (3rd ed.), replacing the previous RBT Task List (2nd ed.). The regulations now have outdated language by referring to the RBT task List.
- Expanded Curriculum: Additional content areas have been added to the required training ([RBT 2026 40-Hour Training Requirements and Curriculum Outline](#))
- Training materials referencing the 2nd edition Task List or certificates dated before January 1, 2026, are now considered outdated.
- Major training providers, such as Relias, have released updated training curricula to be BACB compliant.
- The BACB announced these changes in 2023 and gave plenty of lead time for the provider community to prepare.

The IBHS regulations reference both RBT certification and training certificates issued for 40 hours of training in what was the RBT task list and is now the RBT Test Content Outline.

Applicable Regulatory Requirements:

- Definitions: Registered Behavior Technician (RBT) certification, a certification by the BACB.
- § 5240.71 and § 5240.81 (2) Have a certification as an RBT.
- § 5240.71(5) and § 5240.81(5) (5) Have a high school diploma or the equivalent of a high school diploma and have completed a 40-hour training covering the RBT Task List as evidenced by a certification that includes the name of the responsible trainer, who is certified as a BCBA or BCaBA.

OMHSAS is taking this time to affirm that meeting the BACB standards, referenced as certification in the three regulatory requirements above, is the standard OMHSAS is looking for. In order to avoid confusion between name changes now and in the future OMHSAS will utilize the terminology the BACB is currently using where possible, and in all other places default to BACB certification as referenced in the regulations.

### Training guidelines specific to IBHS

In order to best assist providers in preparing for upcoming licensing visits, please consider the following:

- BHT/BHT-ABAs switching agencies now may not have the newly required training. If staff were trained under the 2nd edition Task List at a previous agency, it does not preclude them from being hired in 2026, but the new provider should have a plan in place for the BHT/BHT-ABA staff to acquire the new 3rd edition training within the year.
- Existing BHT/BHT-ABA staff should be updating their training to be in compliance with 3<sup>rd</sup> edition training within one year of holding a 2nd edition training certificate.
- New hires without prior BHT/BHT-ABA experience, who fall under one of the regulatory requirements listed above, should be trained using the 3rd edition curriculum.
- After 2026, all BHT/BHT-ABA staff who fall under one of the regulatory requirements listed above should be trained in the 3rd edition curriculum.
- Staff who hold active RBT certification must follow current BACB requirements for ongoing certification.
- The BACB has issued language that the new RBT Test Content Outline (3<sup>rd</sup> edition) 2026 certificates must include. The language is as follows: “This training program is designed to meet the 2026 training eligibility requirement for RBT certification. The training is offered independent of the BACB.” Licensing staff will review these new RBT certificates for compliance.
- Any future editions can follow the one year phase in time frame we’ve outlined here unless there is some reason not to.

Please contact [ra-pwibhs@pa.gov](mailto:ra-pwibhs@pa.gov) with any questions regarding the above guidance.