

Megan McCarron, MS., BCBA  
22 Usher Street  
Milford, CT 06460  
Phone: (203) 910 – 0992  
Fax: (904) 432 – 8464  
E-Mail: mccarron@cccdinc.org

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Thomas P. Gaffey, Co-Chair  
Andrew M. Fleishmann, Co-Chair  
Education Committee  
Room 3100, Legislative Office Building  
Hartford, CT 06106

**RE: Raised Bill # 6666, Section 7**

An act requiring School Districts to utilize Board Certified Behavior Analysts when and individual education plan includes applied behavior analytic services as part of a student's special education

To Whom It May Concern:

I am a behavior analyst providing services to children with Autism and am in support of Raised Bill # 6666, Section 7. I support this bill because it is necessary to ensure that children with autism receive a free and appropriate education implemented by qualified personnel.

As things stand now, school districts do not have systematic procedures or policies in place for vetting potential behavior analytic service providers or consultants. It is standard practice to require certification credentials for teachers, special education teachers and other related service providers such as occupational therapists or speech pathologists. I feel that it is imperative that this practice be put in place for Behavior Analytic Services.

The recent situation with Stacy Lore of Spectrum Kids, LLC, who we have reason to believe, does not possess the training and credentials she claimed, and who has been paid hundreds of thousands of dollars by both school districts and parents highlights this statewide problem. It has been reported that Ms. Lore / Spectrum Kids have been working in at least 6 school districts within this state providing what appears to be bogus services to potentially dozens of children. This bill would help to avoid future situations of this nature.

Additionally, IDEA states that related service personnel qualifications must be either "consistent with any State-approved or State-recognized certification...or with other comparable requirements that apply to the professional discipline in which those personnel are providing special education or related services". With this federal

legislation already in place, and a national certification program for Behavior Analysis already in existence, the State Department of Education should recognize the certification, and mandate that school districts follow the existing protocols in place for related service providers, i.e., obtain and maintain a copy of each person's proof of certification, and submit an annual attestation to the state. Doing this will cost little to no money and go a long way to ensuring that those people providing services are qualified. In fact, the state of Connecticut has been requiring proof of certification from behavior analysts employed by the Connecticut Birth to Three system for several years, so there is already a state precedent for this position. Additionally, given that federal law always trumps state law, it would seem that Connecticut's current practices are out of compliance with IDEA requirements.

Lastly, I would like to clarify that my understanding of this bill is that it is designed to require that school districts use a board certified behavior analyst in the fulfillment of a student's 504 plan or IEP which is in keeping with the process of how an individualized education plan is designed. It is not intended to mandate that every student have Behavior Analytic services added to their 504 plans or IEPs. Its purpose is to ensure that those students who do have Behavior Analytic Services called for in their 504 plans or IEPs receive those services from qualified service providers. The summary statement at the end of the bill, is worded in a rather ambiguous way. I feel that it would be worth rewording the summary statement at the end of the bill to make this distinction clear. As it reads now, it appears as if this bill is designed to mandate behavior analytic services.

Sincerely,

*Megan McCarron*

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