

Dear Education Committee:

I am writing to express my opposition to SB 1105. Applied Behavior Analysis (ABA) is an ever growing set of evidence-based interventions requiring years of education, experience, and expertise by the individuals who develop programs for individuals with autism spectrum disorders. Applied Behavior Analysis is a field in its own right just as are Special Education, Speech and Language Pathology, Occupational Therapy, School Psychology, and other such professions that provide treatment to persons with developmental disabilities. In order to ensure that Applied Behavior Analytic interventions are properly implemented for individuals with autism spectrum disorders, it is absolutely essential that the professionals developing the ABA programs have the proper credential to do so. Applied Behavior Analysis is not a field that can be learned by attending a few workshops. It requires a great deal of study and properly supervised experience. Professionals with licensure and certification in other disciplines without proper and specific education, expertise, and experience in developing ABA programs for children with developmental disabilities are not qualified to do so.

I am additionally concerned about overburdening already overloaded professionals (Special Education teachers, SLPs, OT, psychologists, administrators, etc) with duties beyond their scopes of expertise. These professionals are currently only providing services for which they have been trained and find themselves with too many children to treat and not enough time. In the public schools, I hear their cries of being overwhelmed on a regular basis. The needs of the children are great.

Furthermore, I am concerned about the cost – not only the ultimate cost to the children's quality of life who would receive services not fully representative of Applied Behavior Analysis, but of the actual cost of providing for more services into adulthood by not providing the appropriate services now.

Finally, there are 2 levels of certification by the Behavior Analysis Certification Board (BACB). In question today is who should supervise an individual who is certified at the lower level of the 2, the Board Certified Assistant Behavior Analyst (BCABA). The Assistant Behavior Analyst has not had the necessary education or experience to be qualified to develop ABA programs without the supervision of a Board Certified Behavior Analyst (BCBA or BCBA-D). To require that supervision for an Assistant be provided by a school administrator, but not a BCBA, would result in substandard services.

Additionally, according to the BACB Code of Ethics, a BCABA should not practice without the supervision of a BCBA, so it is unlikely that an Assistant Behavior Analyst would work within this structure. This situation would actually reduce the pool of professionals to provide ABA services in public schools in Connecticut.

Please consider this testimony in opposition to SB 1105. The bill is not in the best interest of Connecticut's students with autism spectrum disorders and their families or the professionals upon whom the responsibility for providing services outside of their areas of expertise would fall.

I have been working with individuals with autism spectrum disorders for over 20 years. I have worked with many different disciplines. Each has strengths it brings to the teams

working with the children as each has its specific areas of expertise. Applied Behavior Analysis is a specific area of expertise. Please recognize it as such.

Most sincerely,

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