

To: Education Committee

From: Kristine L. Marino, M.S., BCBA

Date: March 7, 2011

1. Opposed to Section 1 changing the criteria of who is qualified to provide services;
2. Opposed to adding an administrator to direct ABA services

I am writing to you to express my opposition of proposed SB 1105. I am a Board Certified Behavior Analyst working in the field for 11 years. I work collaboratively with many related service providers, including Speech and Language Pathologists and Occupational Therapists, and have had wonderful working relationships with many public school teachers and principals. While I appreciate their various areas of expertise and believe these individuals to be a valuable part of the educational team, I find it appalling that allowing individuals who have not met educational standards in a specific area would be allowed to work in that area, as seems to be the case by this proposed bill. I would never attempt to provide OT or SLP services as that is not my area of expertise, nor would I think this would be accepted in any other field or with any other population. It makes no sense that the rules would be different here. I completed extensive supervised hours in practicum, challenging coursework, a certification exam, and routinely receive continuing education in order to be sufficient at my job. I am bound by ethical guidelines through the Behavior Analyst Certification Board to continue my education, keep up with peer-reviewed research, and not to work outside my area of expertise without further education in that area. My mentors and supervisors are Behavior Analysts who have higher levels of expertise and experience, such that I can continue to learn and provide the best services to my clients. Administrators such as principals, again, do not have that area of expertise, and working under such an administrator could further impede my client's progress with ABA services.

The ramifications of allowing individuals to attempt to provide services in an area that they do not have sufficient knowledge of are dire, particularly for our fragile population of students with Autism. Educational time lost can, in most cases, lead to regression. Additionally, the idea of putting more responsibility on SLPs, Special Education Teachers, and others when there are already not enough of them to provide their own services can further lead down a road of poor services due to lack of resources. We want our clients to be able to be as independent as possible, and unless we provide the proper services now, we will see poor outcomes and individuals who are dependent on services for the remainder of their lives. I urge you to please reconsider this bill and what it will do to our students, their families and their school districts.

Thank you so much for your time and consideration,

Kristine L. Marino, M.S., BCBA