

I could not oppose (HB 5537) more strongly.

It has come to my attention that currently proposed house bill (HB 5537), Section 6 proposes to extend “the scope of practice” definition for Speech and Language Pathologists in Connecticut to include the practice of Applied Behavior Analysis. It is also my understanding that the practice of Behavior Analysts and the practice of Applied Behavior Analysis is currently defined in existing Connecticut legislation (Public Act No. 09-115) as "Applied behavior analysis" means the design, implementation and evaluation of environmental modifications, using behavioral stimuli and consequences, including the use of direct observation, measurement and functional analysis of the relationship between environment and behavior, to produce socially significant improvement in human behavior.

It may be a poor comparison but this proposed legislation may be equivalent to extending the scope of practice of electricians in the state of Connecticut to include the practice of computer science just because both computer scientist and electricians may work with computers systems. Each field may know about each other’s work, but are not claiming and would never claim to be certified or educated in each other’s field of work. No consumer would be expected to agree to receive services from a computer scientist when they require an electrician to do some work for them, as well as no consumer should be expected to accept an electrician to redesign their computer systems. Behavior Analysts and Speech and Language Pathologists are not interchangeable and have different areas of expertise and education!

To “extend the scope of practice” of Speech and Language Pathologist with the proposed house bill (HB 5537) to include the practice of Applied Behavior Analysis would be a disservice to all consumers of Applied Behavior Analysis services in the state of Connecticut. It could be considered to be harmful to the public interest and negligent. This proposed bill would attempt to artificially expand the area of education and certification for Speech and Language pathologists in the state into areas of expertise where they have not received any approved or certified education during their education as a Speech and Language Pathologist.

To the best of my knowledge no Speech and Language Pathologist educational program in the United States has received approval or has been recognized by the Behavior Analysts Certification Board (BCAB) as a program meeting the necessary requirements to be an certified Behavior Analysis educational program in the US. The BACB is responsible for regulating the standards of programs currently offering education in behavior analysis. The BACB is the regulating and certifying body which certifies both educational programs wanting to offer degrees in Behavior Analysis and also oversees the certification of candidates who have received the educational background and supervised hours as a Board Certified Behavior Analysts.

I know of Speech and Language pathologist who have received the additional BACB approved education to become a candidate for certification as a Board Certified Behavior Analyst (BCBA). These are few individuals who hold both certifications and have received formal and approved training in both fields, and maintain good standing within both fields and maintain current their necessary continuing education credits in both fields in order to maintain their current dual certifications. I suspect that most, if not all, of these rare individuals would agree that they only

feel qualified to practice in both fields due to their formal training and continuing educational efforts in both fields of study.

I could not oppose HB 5537, Section 6 more strongly.... It is legislation that would potentially harm all consumers of Applied Behavior Analysis in the state of Connecticut by allowing unqualified persons to include Behavior Analysis “within the scope of their practice”. Speech and Language Pathologists currently receive no formal training or certification and are not responsible to stay current with their knowledge of Applied Behavior Analysis. Their Speech and Language Certification does not include any requirements for any education in behavior analysis and/or need to maintain their expertise in this field of study current with continuing education in Behavior Analysis.

Thank you for the opportunity to voice some of my more salient and obvious concerns with the proposed HB 5537.

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