

Donn C. Sottolano HB 5537

Dear Sir/Madam,

Hopefully, you will receive substantial testimony regarding the inappropriateness of this proposed change to the scope of practice of Speech Language Pathologist. Given that consideration I will be brief and address what I believe is a serious consideration with regards to this issue. The 'Scope of Practice' as described by the American Speech-Language-Hearing Association (ASHA) is clear regarding qualifications for practicing clinical services and does not include 'applied behavior analysis'. Please note that in order to provide clinical services SLPs must obtain a 'recognized' degree, obtain postgraduate experience, and pass a national examination. Coincidentally, these same requirements are in place in order to become a *'Board Certified Behavior Analyst'* (see below). Neither ASHA nor the BACB (Behavior Analysis Certification Board) specifies that a SLP can provide applied behavior analysis services or a BCBA can provide speech-language-hearing services. In fact it is considered unethical to practice a therapy for which you have no training. It is quite disturbing to me that within our State there seems to be a somewhat common misconception, or cavalier attitude, that 'anyone' can do applied behavior analysis. Let me assure you that is not true. A well-intentioned but untrained person can in fact cause serious jeopardy to children with autism and other disabilities by exacerbating behavior such as self-injury, aggression, stereotypy etc. as a result of the absence of academic preparation and clinical supervision in applied behavior analysis.

Please take into consideration why the field of Applied Behavior Analysis has grown exponentially over the past decade . . . why would this be so if SLPs and others already working with our student population had the skills necessary to mitigate behavior excesses and deficits.

Finally, my best friend is a SLP and my administrative collaborator is a licensed SLP now working as a Vice Principal; both are shocked at the proposed legislation given they have never been trained in applied behavior analysis. That from the people whom you are proposing to recognize as having training and expertise (how else could it be in their scope of practice) in applied behavior analysis.

Eligibility to sit for the BCBA certification examination requires completion of Sections A and B below and compliance with all other rules and requirements of the BACB.

A. Degree Requirement:

Possession of a minimum a master's degree that was conferred in behavior analysis or other natural science, education, human services, engineering, medicine or a field related to behavior analysis and approved by the BACB from any of the following:

1. A United States institution of higher education listed in the [CHEA Database of Institutions and Programs Accredited by Recognized U.S. Accrediting Organizations](#); OR

2. A Canadian institution of higher education that is a member of the [Association of Universities and Colleges of Canada](#) or the [Association of Canadian Community Colleges](#); OR
3. An institution of higher education located outside the United States or Canada that, at the time the applicant was enrolled and at the time the applicant graduated, maintained a standard of training equivalent to the standards of training of those institutions accredited in the United States as demonstrated by [World Education Services](#) or by a member of the [National Association of Credential Evaluation Services](#).

B. Training and Experience Requirements

OPTION 1: COURSEWORK OPTION

1. **Coursework:** The applicant must complete **225 classroom hours of graduate level instruction** (see Acceptable Coursework below) in the following content areas and for the number of hours specified:
 1. Ethical considerations - 15 hours
 2. Definition & characteristics and Principles, processes & concepts - 45 hours
 3. Behavioral assessment and Selecting intervention outcomes & strategies - 35 hours
 4. Experimental evaluation of interventions - 20 hours
 5. Measurement of behavior and Displaying & interpreting behavioral data - 20 hours
 6. Behavioral change procedures and Systems support - 45 hours
 7. Discretionary behavior-analytic content - 45 hours

2. Categories of Supervised Experience

3. **SUPERVISED INDEPENDENT FIELDWORK (1500 hours BCBA, 1000 hours BCaBA)**
4. To qualify under this standard at the **BCBA level, supervisees must complete 1500 hours of Supervised Independent Fieldwork in behavior analysis**. To qualify under this standard at the BCaBA level, supervisees must complete 1000 hours of Supervised Independent Fieldwork in behavior analysis. A supervisory period is **two weeks**. In order to count experience hours within any given supervisory period, supervisees must be supervised **at least once** during that period for no less than **5%** of the total hours spent in Supervised Independent Fieldwork. For example, 20 hours of experience would include at least 1 supervised hour.

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