

To Whom It May Concern,

I am a licensed psychologist and Board Certified Behavior Analyst in the state of Connecticut. I oppose HB 5537, Section 6 for the following reasons:

1. ABA is not currently within the scope of practice of Speech Language Pathologists.
2. Speech Language Pathologists are not required to take any classes in behavior analysis, nor do they have any training or experience requirements related to the provision of behavior analytic services as part of their training to become SLP's.
3. Consumers of ABA services would be negatively impacted by this modification to an SLP's scope of practice.
4. Behavior Analysis and the scope of practice of Behavior Analysts has been defined in existing CT legislation, and this expansion of an SLP's scope of practice would negatively impact other professionals including but not limited to Board Certified Behavior Analysts and School Psychologists.
5. Any proposed expansion of an SLP's scope of practice must first be reviewed in accordance with Public Act 11-209, An Act Concerning the Department of Health's Oversight Responsibilities Relating to Scope of Practice Determinations for Health Care Professionals.

In summary, the ability to practice Applied Behavior Analysis with competency and effectiveness involves a rigorous combination of instruction, ongoing training and supervision, and competency evaluation. Allowing untrained individuals to engage in this practice is unethical and harmful to public consumers.

Thank you for your attention to this matter.

Sincerely,

Felicia Morgan, Ph.D., BCBA-D
Licensed Psychologist
Board Certified Behavior Analyst