

February 18, 2015,

Senator Gerratana, Representative Ritter and Members of the Public Health Committee,

I am writing to you pertaining to HB6267 proposed by Representative Srinivasan. I am a licensed clinical psychologist in the State of Connecticut who specializes in forensic psychology. I have also held an appointment as Assistant Clinical Professor at Yale University School of Medicine-Department of Psychiatry-Psychology Section since 2002 as a voluntary part-time faculty member. A significant degree of my practice is devoted to work in the family courts as a court appointed custody evaluator, co-parenting therapist, and Guardian Ad Litem. I also provide discounted and no-fee services in these roles for indigent families.

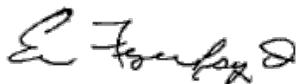
I wish to express my strong opposition to HB6267 based on the following reasons:

1. The DPH already has an appropriate procedure for investigation. They utilize proper guidelines and methods for conducting investigations by collecting and reviewing information based on the nature of the allegation. There is no existing finding or reasonable assertion that the DPH does not know 'how to investigate
2. The DPH already has appropriate and acceptable guidelines and procedures for conducting hearings. There is no legitimate basis to probe into the structure of a hearing, nor the professional judgement behind which cases evolve into hearings and which do not. Such a request shifts the inquiry from the question of hearing procedure to the character and professional judgement of the professional employees running the hearings. A task force does not and should not have the authority to override the standing governmental powers that oversee the DPH operating procedures until and unless it has been proven those supervisory procedures have failed. This has not been demonstrated.
3. There is no legitimate foundation to assert that the role of the DPH should have special and unique obligations attached to the oversight of mental health professionals involved in custody matters. This is a discriminatory and inappropriate line of reasoning inconsistent with the mandate of the DPH.
4. The Bill's proposal "to study" various aspects of the DPH and mental health professionals involved in custody matters is a veiled request for improper access to DPH personnel, resources, records, and possibly unauthorized confidential health information which could be a Federal HIPPA violation.
5. The Bill's proposal "to study" aspects of the DPH and mental health professionals presupposes a task force with a degree of specialized education, knowledge, and training that would warrant the ability to study the DPH, their functioning, and the

information under their purview. Only a credentialed and qualified expert would be the proper professional to engage in this type of proposed activity. An example would be an experienced licensed psychologist in the State of Connecticut who practices in the area of child custody matters.

6. The Bill's request to "study" is asserting that there is a problem with aspects of the DPH and mental health professionals. This request is not backed by objective data, actuarial findings, or scientific conclusions.
7. The nature of this Bill suggests that there are improper procedures and relationships between the DPH and mental health professionals involved in child custody matters. First, if this assertion is made, it would be based on a family law case. The emotional nature of these cases results in highly subjective experiences by divorce litigants. Those who are in high-conflict and require the involvement of a mental health professional, and ultimately a decision by a Judge to determine a custodial arrangement are truly the statistical exception. Undoubtedly, personal and emotional stories will be told alleging improprieties. It would be improper for consideration of House Bill 6267 to be considered without patterned objective evidence and professional conclusions that the DPH is not functioning effectively in its conduct of mental health professionals. To this point, this means any assertions backing this Bill, would in fact need to completely audit the family file on the case to first authenticate the legitimacy of the claim. This would mean reviewing all public records on the case including, but not limited to, all motions filed on the case, hearing, trial, and deposition transcripts, memorandum's of decision and any judicial outcomes, findings made by the Court on that case from start to finish, filed appeals and appellate decisions, etc. Without this data, there is no comprehensive method and objective procedure to determine if the emotional stories told that are backing this bill have any objective legitimacy. It is my belief, that the proponents of this bill would not be able to offer significant and objective data-supported conclusions backing their assertions because it does not exist.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric Frazer, Psy.D.", with a stylized flourish at the end.

Eric Frazer, Psy.D.  
Licensed Clinical Psychologist  
Assistant Clinical Professor-Yale University School of Medicine