



**TESTIMONY OF
THE CONNECTICUT OCCUPATIONAL THERAPY ASSOCIATION
BY
MORGAN VILLANO, BOARD MEMBER FOR GOVERNMENT AFFAIRS
OPPOSING – SECTIONS 10 & 23-29
SB-1089, AAC MENTAL HEALTH
PUBLIC HEALTH COMMITTEE
MARCH 18, 2015**

On behalf of the Connecticut Occupational Therapy Association (ConnOTA), which represents Occupational Therapists and Occupational Therapy Assistants practicing in a variety of settings (hospitals, schools, rehab facilities, nursing homes, private practice, etc.) in nearly every city and town across Connecticut, we respectfully submit serious concerns regarding sections 10 and 23-29 of SB 1089; specifically related to scope of practice and licensure for Applied Behavior Analysts in Connecticut.

It is ConnOTA's understanding that the Department of Public Health did not act upon the written request from the Connecticut Association for Behavior Analysis (CT ABA) in 2014 to consider and review the scope of practice change requests, pursuant to the well-established "scope of practice review" process that was enacted by the legislature through Public Act 11-209. Professional courtesy amongst state organizations representing health professions includes contacting and dialoguing with other professional associations that could be impacted by one discipline's proposed scope of practice changes, to ensure that all parties understand the language expectations and have the opportunity to respond; the CT ABA did not reach out to ConnOTA prior to submitting to DPH scope of practice changes. Given this, CT ABA submitted the following scope of practice language to which ConnOTA raises objection: in the definition of "Behavior Analysis," the CT ABA indicates that the role of the ABA professional encompasses the proposed language, "...**design, implementation and evaluation of environmental modifications, using behavioral stimuli and**

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consequences, including the use of direct observation, measurement and functional analysis...” (See Sec. 23, lines 438-441). ConnOTA takes concern with this proposed language as licensed occupational therapists currently use similar scope of practice language to direct sensory integration, mental health and aging in place assessments and treatment (See C.G.S. Sec. 20-74(a)(1)). Licensed occupational therapists complete functional assessments that include the role and impact of the environment on a person’s valued occupations which in turn directly affects the treatment plan for optimal functioning. Behavior analysts have not done due diligence - they are advocating for scope of practice language changes to a proposed bill versus review and consideration of the language changes by other health and medical professional organizations in the State as well as continuing to utilize the “scope of practice review” process through the Department of Public Health, which licenses the majority of medical and health related professionals in Connecticut.

The language in Sections 23-29 of SB 1089 that includes licensing for Behavior Analysts further raises concern: licensing is a process that the Department of Public Health oversees for health/medical professionals in the State, where qualifications for licensure as well as professional expectations are itinerized in an effort to ensure safe and successful outcomes for the recipients of said services. The CT ABA is supporting licensure language to SB 1089 that has not been considered, reviewed or processed by the Department of Public Health - this is concerning as the governing health/medical practice body of Connecticut does not have the content or qualifiers for a behavior analyst to practice in Connecticut at this juncture.

ConnOTA respectfully requests that the behavior analyst language included in SB 1089 (**sections 23-29**) including both scope of practice and licensure, **be removed** and postponed for further review and consideration by *ALL* impacted health professions.

Thank for the opportunity to comment, and ConnOTA looks forward to working with the Co-Chairs, Ranking Members, and the entire Public Health Committee to address our concerns.

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