

Dear Chair Wood and Members of the House Human Services Committee:

The American Academy of Pediatrics Vermont Chapter, Vermont Academy of Family Physicians, Vermont Psychiatric Association and Vermont Medical Society urge the Vermont General Assembly to oppose J.R.H. 9. While we deeply respect the experiences of families and individuals with autism or apraxia of speech, this resolution asks the legislature to take a position against the scientific consensus of the nation's leading speech-language pathology and audiology association — a step that could ultimately harm the very students it seeks to help.

The core scientific objection is the authorship problem: because the instructor is holding the board and actively prompting throughout, there is no reliable way to know whether the message being spelled out belongs to the student or is being unconsciously influenced by the instructor. This unintentional influence is called facilitator bias — the instructor may subtly shift the board or cue the student toward letters they expect the student to choose, without meaning to. This is why the American Speech-Language-Hearing Association's (ASHA) groups RPM with Facilitated Communication (FC), a technique that has been thoroughly discredited by decades of peer-reviewed research. Both are considered "facilitator-dependent" methods.

It is important to note what ASHA does *not* oppose. ASHA strongly supports augmentative and alternative communication (AAC), literacy instruction, multimodal communication, letterboards, and speech-generating devices — when the message is clearly authored by the individual. The concern is not with spelling or motor supports; it is with facilitator-dependent techniques that have not demonstrated, through rigorous scientific study, that the communications produced are genuinely those of the person with the disability.

The General Assembly's role is to ensure that Vermont students receive evidence-based services to which they are entitled under state law — services proven to build independent, self-directed communication skills over time. Directing a national professional body to reconsider its evidence-based position, based on anecdote rather than peer-reviewed science, sets a troubling precedent and risks steering families toward an unproven method when effective alternatives exist.

We share the resolution's underlying goal: ensuring that every Vermont student with apraxia of speech or autism has every opportunity to communicate, be heard, and thrive. The path to that goal runs through evidence-based practice that protects students' autonomy and authentic voice.

For these reasons, we respectfully urge the committee to oppose J.R.H. 9.

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