

March 1, 2024

The Honorable Liz Boldon Minnesota Senate 95 University Avenue W. Minnesota Senate Bldg., Room 3201 St. Paul, MN 55155

RE: SF 2982: SLPA Requirements

Dear Senator Boldon:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to express support, with amendments, for SF 2982, which provides additional deliniations and protections for the practice of speech-language pathology assistants (SLPAs).

ASHA is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 3,700 ASHA members reside in Minnesota.¹

We believe that using appropriately trained and supervised SLPAs can help alleviate staffing shortages. Staffing shortages can hinder professionals' ability to address the critical needs of those with communication and related disorders who might not otherwise be able to achieve their full academic, social, and emotional potential. As such, ASHA supports the language in this bill requiring supervision by a licensed SLP who holds ASHA's Certificate of Clinical Competence (CCC).

Following are our suggested amendments for SF 2982.

Section 11 Licensure; Speech-Language Pathology Assistants

ASHA recommends adding language to this section that would allow SLPAs to meet the Minnesota requirements by meeting the standards for ASHA's SLPA Certification.² Specifically, we recommend amending this section to include the 100-plus hours of fieldwork with the option to be completed on the job with a current or former ASHA-certified SLP rather than solely based on academic practicum.

Section 17, Subdivision 2, Delegated Duties; Prohibitions

For responsibilities within the SLPA scope, we recommend including additional language consistent with ASHA's Scope of Practice for SLPAs.³ We also recommend amending this section to include the additional restrictions on SLPA practice consistent with the prohibition section of ASHA's Scope of Practice for SLPAs. For example, the bill's current language does not prohibit the SLPA from treating medically fragile students, patients, and clients without 100% direct supervision.

Section 18, Subdivision 3, Supervision Requirements

The proposed bill specifies the percentage of supervision for before and after the first 90 workdays. Though we accept the suggested requirements, ASHA has moved away from this

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style of requirement. We now specify that the "supervision must be based on (a) the needs, competencies, skills, expectations, philosophies, and experience of the SLPA and the supervisor; (b) the needs of students, patients, and clients served; (c) the service setting; (d) the tasks assigned; and (e) other factors."

We support the bill language allowing supervision to include real-time, two-way interactive audio and visual communication as part of the direct supervision definition.

ASHA also supports including language recommending that the SLP supervise no more than two full-time SLPAs. However, ASHA's Scope of Practice for SLPAs no longer recommends a specific number of SLPAs under SLP supervisors. Instead, it states:

"The amount and type of supervision required must be consistent with (a) the SLPA's skills and experience; the needs of the students, patients, and clients; (c) the service setting; (d) the tasks assigned; and (e) the laws and regulations that govern SLPAs."

Thank you for considering ASHA's comments and suggested amendments to SF 2982. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at <u>ecrowe@asha.org</u>.

Sincerely,

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Tena L. McNamara, AuD, CCC-A/SLP 2024 ASHA President

¹ American Speech-Language-Hearing Association. (2022). *Minnesota* [Quick Facts].

https://www.asha.org/siteassets/advocacy/state-fliers/minnesota-state-flyer.pdf

² American Speech-Language-Hearing Association. *Become a Certified Speech-Language Pathology Assistant (SLPA)*. https://www.ashaassistants.org/pathways-speech-language-pathology-assistant/

³ American Speech-Language-Hearing Association. *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <u>https://www.asha.org/policy/slpa-scope-of-practice/</u>