

October 6, 2022

Colorado Department of Education
Ms. Elizabeth Cordial
Director of State Board Relations
1025 Ninth Ave.
Greeley, CO 80631

RE: Opposition and Amendments to Assistant Regulations

Dear Ms. Cordial:

On behalf of the American Speech-Language-Hearing Association, I write in opposition to the proposed regulations regarding the emergency authorization for those who have not yet completed their speech-language pathology assistant (SLPA) requirements. ASHA also recommends amending the requirements for assistant supervisors and for the scope of the SLPA.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Speech-language pathologists identify, assess, and treat speech, language, and swallowing disorders. Over 4,200 ASHA members reside in Colorado.¹

ASHA recommends deleting the emergency authorization for SLPAs under Section 4.03., which allows the assistant to practice while only holding a bachelor's degree in speech, language, and hearing sciences; communications disorders speech sciences; or any other field with completion of 24 semester hours in speech, language, hearing sciences from an accepted institution of higher education.

Under the current regulations (Section 4.11) for SLPAs, practitioners must hold a bachelor's degree in speech communication, speech-language pathology, communication disorders-speech sciences or a bachelor's degree in any other field with completion of 24 semester hours in speech language hearing sciences from an accepted institution of higher education, have successfully completed a minimum of 100 clock-hours of a school-based practicum, are under the supervision of an ASHA certified and license school speech-language pathologist (SLP), and have demonstrated knowledge and skills in the required competencies. ASHA maintains that the existing competencies required under the current regulations for assistants, along with the required supervision, are critical in protecting the children that they serve.

ASHA recently updated its scope of practice for SLPAs. Therefore, ASHA recommends amending Section 4.11(4) so to be consisted with these updates as follows: :²

The SLPA is knowledgeable about screening and assessment, but may not perform standardized or non-standardized diagnostic tests, including, but not limited to, **administering or interpreting feeding and/or swallowing screenings, checklists, and assessments**, and is able to...

ASHA also recommends adding the following new language under the SLPA scope of practice in Section 4.11:

The SLPA may not counsel parents but may engage in the following:

Provide caregiver coaching (e.g., model and teach communication strategies, provide feedback regarding caregiver-child interactions) for facilitation and carryover of skills.

Share objective information (e.g., accuracy in speech and language skills addressed, participation in treatment, response to treatment) regarding student, patient, and client performance to students, patients, clients, caregivers, families and other service providers without interpretation or recommendations as directed by the SLP.

Demonstrate strategies included in the feeding and swallowing plan developed by the SLP and share information with students, patients, clients, families, staff, and caregivers.

Provide culturally responsive services while communicating and collaborating with students, patients, clients, the supervising SLP, colleagues, families, caregivers, and other stakeholders.³

ASHA further recommends the following new language addressing testing in Section 4.11:

The SLPA may assist the SLP during assessment of students, patients, and clients (e.g., setting up the testing environment, gathering and prepping materials, taking notes as advised by the SLP, etc.).

Finally, ASHA recommends the following new language addressing telepractice in Section 4.11:

SLPAs may providing services via telepractice to students, patients, and clients who are selected by the supervising SLP.

In addition, ASHA recommends clarifications around the supervising SLP qualifications in Section 4.11(1)(c). In addition to being ASHA-certified and licensed, complete two hours of professional development in the area of supervision and have had at least nine months of full-time practice experience after being awarded ASHA certification.⁴

Thank you for considering ASHA's proposed changes to the speech-language pathology assistant regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,



Judy Rich, EdD, CCC-SLP, BCS-CL
2022 ASHA President

¹ American Speech-Language-Hearing Association. (2021). *Colorado* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/colorado-state-flyer.pdf>.

² American Speech-Language-Hearing Association. (n.d.). *ASHA Scope of Practice for the Speech Language Pathology Assistant*. <https://www.asha.org/policy/slpa-scope-of-practice/>.

³ Ibid.

⁴ American Speech-Language-Hearing Association. (2020). *2020 Standards for ASHA Speech-Language Pathology Assistants Certification*. <https://www.asha.org/certification/2020-slpa-certification-standards/>.