



August 6, 2019

The Honorable Jim Cox
Pennsylvania House of Representatives
209 Ryan Office Building
PO Box 202129
Harrisburg, PA 17120-2129

RE: HB 811 Occupational Licensure

Dear Representative Cox:

On behalf of the American Speech-Language-Hearing Association, I write with a concern about HB 811, a bill that would negatively impact individuals who have obtained the Certificate of Clinical Competence.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists identify, assess, and treat speech and language disorders, including swallowing disorders. Over 8,350 ASHA members reside in Pennsylvania.

The Certificate of Clinical Competence (CCC) is a nationally recognized credential for audiologists (CCC-A) and speech-language pathologists (CCC-SLP). Extensively trained and dedicated to improving lives, ASHA-certified professionals are committed to excellence and adhere to the highest ethical standards. Only those who complete a rigorous academic program, pass a national examination, and pursue continuing education are eligible to be ASHA-certified.

As currently written, HB 811 defines 'certification' as being provided only by a licensing or certifying body and would restrict audiologists and speech-language pathologists who have obtained the CCC from using the credential in their professional title. Given that private certifications provide important assurances to the public that certified professionals have relevant qualifications and meet established standards, ASHA requests that you modify the bill to avoid this undesirable outcome.

ASHA recommends the following amended definition of 'certification':

"Certification" is a voluntary program in which (a) a private organization or (b) the state government grants nontransferable recognition to an individual who meets personal qualifications established by (a) the private organization or (b) the legislature. With the initial and continuing approval of the issuing private organization or government agency, the individual may use "certified" as a designated title. A non-certified individual may not use the title "certified" issued by the organization or agency.

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If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Shari B. Robertson". The signature is written in a cursive, flowing style.

Shari B. Robertson, PhD, CCC-SLP
2019 ASHA President