



ASHA

American
Speech-Language-Hearing
Association

Submitted via e-mail: Angela.C.Sanders@tn.gov

April 13, 2021

Ms. Angie Sanders, Esq.
General Counsel
Tennessee State Board of Education
500 James Robertson Parkway, 5th Floor
Nashville, TN 37243

RE: Comments on 0520-02-03-.05 Requirements School Services Personnel Licenses

Dear Ms. Sanders:

On behalf of the American Speech-Language-Hearing Association, I write to support the Board of Education's regulations for expanding the School Services Personnel License to regulate school speech-language pathology assistants (SLPAs), with amendments.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,700 ASHA members reside in Tennessee.¹

ASHA supports the Board's decision to amend the School Services Personnel License to include SLPAs. To serve Tennessee's growing and more diverse student base and the expanding scope of services that speech-language pathologists (SLPs) are trained to deliver, more providers are necessary. In an era of heightened demand for cost efficiency, some tasks may be more appropriate for support personnel than for professional level providers. The use of properly trained assistants allows licensed SLPs to focus on professional level student services (i.e., those that require ongoing clinical judgment) rather than on routine, day-to-day operational activities.

Ensuring Proper Education and Training Standards for Assistants

To ensure that SLPAs who are hired to work in Tennessee schools are of the highest quality, it is critical that these licensees' training requirements meet the established state standards for the SLPA profession set by the Board of Communication Disorders and Sciences (BCDS) and supported by ASHA. The proposed regulations largely adhere to this standard by establishing BCDS SLPA registration and ASHA's SLPA certification (C-SLPA) as eligibility pathways for prospective candidates for licensure. Both ASHA and the BCDS require SLPAs to have 100 hours of supervised fieldwork experience that provide an appropriate experience for learning the job responsibilities and workplace behaviors of an SLPA.²

However, the proposed regulations also allow candidates to work in schools as an SLPA with only a bachelor's degree in speech-language pathology or only a degree from a Speech-Language Pathology Assistant Program. Neither of these eligibility pathways requires 100 hours of fieldwork experience and, therefore, do not meet the standards of BCDS registration or ASHA certification.

To remedy this discrepancy, ASHA proposes removing eligibility pathways for school services personnel licenses with the SLPA endorsement that do not require 100 hours of fieldwork experience, as follows:

- In Section (3) of 0520-02-03-.05, remove requirement (b), "[h]old a bachelor's degree in speech-language pathology, communication disorders, or speech and hearing sciences from a regionally accredited institution of higher education;"
- In Section (3) of 0520-02-03-.05, remove requirement (d), "[h]old a degree from a Speech-Language Pathology Assistant Program."

ASHA recognizes that the Board of Education seeks to ensure it can meet the demand for services by providing school districts the flexibility to hire SLPAs with various educational backgrounds. BCDS registration and ASHA's C-SLPA already provide this flexibility by accommodating applicants with a bachelor's degree or associate degree in communication sciences and disorders or completing 60 college-level semester credit hours in an SLPA training program (in addition to 100 hours of supervised fieldwork experience).³ ASHA's strong preference is that the training standards of SLPAs are consistent with those set by the BCDS and ASHA. However, if the Board intends to maintain eligibility pathways that do not require a BCDS registration or C-SLPA certification, ASHA recommends amending Section (3)(b) and (d) by requiring an additional 100 hours of fieldwork experience as follows:

- The program of study shall include a minimum of one hundred (100) clock hours of field experience supervised by a licensed Speech-Language Pathologist.⁴ If the applicant's academic institution does not provide for the full one hundred (100) hours of supervised fieldwork experience by a licensed Speech-Language Pathologist, then the applicant shall register with the Board and shall have a minimum of thirty (30) days up to a maximum of ninety (90) days to acquire the full one hundred (100) clock hours of field experience needed to become a fully credentialed Speech-Language Pathology Assistant.

SLPA Scope of Practice

The proposed regulation does not define how SLPAs should be utilized or supervised and what specific responsibilities are within and outside of their clinical practice roles. ASHA recommends that the Board establish a scope of practice for SLPAs consistent with the ASHA Speech-Language Pathology Assistant Scope of Practice and BCDS 1370-01-.14.^{5, 6}

Clarifying the Use of "C-SLPA"

In Section(3)(a), the regulation refers to ASHA's SLPA Certification as "SLPA-C." The proper acronym for this certification is "C-SLPA." ASHA recommends that the Board change this reference to avoid confusion.

Thank you for your consideration of ASHA's comments supporting the regulation of speech-language pathology assistants with amendments. If you or your staff have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at tboyd@asha.org.

Sincerely,



A. Lynn Williams, PhD, CCC-SLP
2021 ASHA President

¹ American Speech-Language-Hearing Association. (2020). *Tennessee [Quick Facts]*. <https://www.asha.org/siteassets/uploadedfiles/Tennessee-State-Flyer.pdf>.

² American Speech-Language-Hearing Association. (n.d.). *C-SLPA certification requires supervision by an ASHA-certified (CCC) SLP*. <https://www.asha.org/certification/education-pathways-to-speech-language-pathology-assistants-certification/>.

³ ASHA's C-SLPA certification requires either a 2-year college degree or bachelor's degree in communication sciences and disorders or related courses from a regionally or nationally accredited institution. <https://www.asha.org/certification/apply-for-slp-assistants-certification/>.

⁴ Ibid.

⁵ American Speech-Language-Hearing Association. (2019). *Speech-Language Pathology Assistant Scope of Practice*. <https://www.asha.org/siteassets/publications/sp2013-00337.pdf>.

⁶ Chapter 1370-01-.14, Speech Language Pathology Assistants and Supervision. Tennessee Board of Communication Disorders and Sciences (BCDS). <https://publications.tnsosfiles.com/rules/1370/1370-01.20160622.pdf>.