



**ASHA**  
American  
Speech-Language-Hearing  
Association

April 4, 2019

Ms. Carol Earle  
Assistant to the Director of State Board Relations  
Department of Education  
201 East Colfax Avenue  
State Board Room 101  
Denver, CO 80203

RE: Revisions to the Educator License

Dear Ms. Earle:

On behalf of the American Speech-Language-Hearing Association, I write to comment on the proposed revisions to the educator license endorsement guidelines.

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. Over 3,900 ASHA members reside in Colorado.

Under 1 CCR 301-101, Section 7.08, School Speech-Language Pathologist (Ages Birth-21), page 150:

To be endorsed as a school speech-language pathologist, an applicant must hold an earned master's or higher degree in communication disorders or speech-language pathology from an accepted institution of higher education; have completed a school speech-language pathology program accredited by the Council on Academic Accreditation (CAA) in the audiology and speech-language pathology of the American Speech-Language-Hearing Association (ASHA); have passed a national state-approved speech-language pathologist specialty-area test; have successfully completed a practicum or internship with children/students ages birth-21 in a school setting, *equivalent to a minimum of eight weeks full-time*, under the supervision of a professionally licensed school speech-language pathologist; and must demonstrate the competencies specified.

ASHA recommends adding language below to include completion of a clinical fellowship that includes:

“36 weeks of full-time (35 hours per week) work experience (or the equivalent part-time experience), totaling a minimum of 1,260 hours. Part-time work can be completed, provided that the Clinical Fellow works more than five hours per week. Working more than 35 hours per week will not shorten the minimum requirement of 36 weeks. A Clinical Fellow must be supervised by a speech-language pathologist who holds ASHA’s Certificate of Clinical Competence (CCC).”

Speech-language pathologists who do not complete a clinical fellowship will not be eligible for ASHA’s CCC. The CCC allows speech-language pathologists to bill Medicaid, transfer to other work settings within the state, and be eligible for reciprocal agreements with other states.

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Thank you for your consideration of ASHA's recommendations on the proposed regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).

Sincerely,

A handwritten signature in cursive script that reads "Shari B. Robertson".

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