



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

Submitted via email to: [venus.vendoures-walsh@idph.iowa.gov](mailto:venus.vendoures-walsh@idph.iowa.gov)

September 29, 2020

Ms. Venus Vendoures Walsh  
Professional Licensure Division  
Iowa Department of Public Health  
Lucas Office Building  
321 East 12th Street  
Fifth Floor, Room 526  
Des Moines, IA 50319

RE: Proposed Rule Related to Continuing Education Hours

Dear Ms. Vendoures Walsh:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments on the proposed rule to amend Chapter 303, *Continuing Education for Speech Pathologists and Audiologists, Iowa Administrative Code*, which proposes to remove the 16-hour cap on remote continuing education hours.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 1,470 ASHA members and affiliates reside in Iowa.<sup>1</sup>

The following rulemaking action is proposed:

Amend paragraph **303.3(2)“f”** as follows:

~~f. A maximum of 16 hours of continuing~~ Continuing education credit may be earned per ~~biennium~~ by participation in continuing education programs and activities which meet the criteria in this rule and which are completed through journal readings, teleconference or videoconference participation, and online program participation. In addition, such programs and activities must include a posttest that the participant must pass in order to receive continuing education credit.

ASHA supports removing the 16-hour cap on remote (live or self-study) continuing education hours. This change is particularly relevant given the challenges of conducting in-person events due to the Coronavirus Disease 2019 (COVID-19) pandemic and the growth in the number of and participation in both self-studies and live courses conducted using technology.

ASHA agrees that having licensees successfully complete a course and meet the intended learning outcomes is appropriate for all courses, regardless of whether they are conducted in person or remotely. We have concerns about maintaining the requirement that, “programs and activities must include a posttest that the participant must pass in order to receive continuing education credit.” Accepting only those remote courses where a *posttest* is conducted is problematic for the following reasons:

- The term “*posttest*” is vague and needs further clarification.

- A posttest may not be the appropriate assessment tool given the course's learning outcomes.
- The licensee may have difficulty confirming that the assessment to be used in the remote course meets the Board's posttest requirement. For example, when an ASHA Approved Continuing Education (CE) Provider submits a course to be offered for ASHA Continuing Education Units (CEUs), the provider indicates the type of learning assessment to be used from the following list: completion of a project, oral examination, oral report, performance demonstrations, question and answer session, self-assessment, written report, written examination or other (and then describe the assessment to be used). Posttest is not language used by ASHA Approved CE Providers.
- Instead of the licensee choosing courses based on their professional learning needs, they must choose from the limited number of in-person courses or restrict their remote courses to only those with a posttest.

ASHA encourages the Board to consider eliminating paragraph 303.3(2) f. As an alternative, we suggest adding to the General Criteria the requirement that an assessment of learning be conducted at all courses (see underlined text):

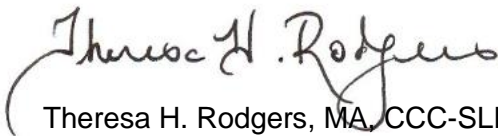
645—303.3(147,272C) Standards.

303.3(1) General criteria. A continuing education program or activity that meets all of the following criteria is appropriate for continuing education credit if the continuing education program or activity:

- a. Meets the definition of continuing education as defined in rule 645—303.1(147);
- b. Is conducted by individuals who have specialized education, training and experience by reason of which said individuals should be considered qualified concerning the subject matter of the program. At the time of audit, the board may request the qualifications of presenters;
- c. Fulfills state program goals, objectives, or both;
- d. Includes an assessment of learning designed to measure the licensee's attainment of the course's learning outcomes; and
- e. Provides proof of attendance to licensees in attendance including:
  - (1) Date(s), location, course title, presenter(s);
  - (2) Number of program contact hours; and
  - (3) Certificate of completion or evidence of successful completion of the course provided by the course sponsor.

Thank you for the opportunity to provide comments on amendments to Chapter 303, *Continuing Education for Speech Pathologists and Audiologists, Iowa Administrative Code*. If you or your staff have any questions, please contact Janet Deppe, ASHA's director of state affairs, at [ideppe@asha.org](mailto:ideppe@asha.org).

Sincerely,



Theresa H. Rodgers, MA, CCC-SLP  
2020 ASHA President

---

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