



September 9, 2020

Mr. Greg Searls
Executive Director
Board of Examiners of Speech-Language Pathology and Audiology
2001 Capitol Ave, Rm 105
Cheyenne, WY 82002

RE: Proposed Regulations for Speech-Language Pathology Assistants and Telehealth

Dear Mr. Searls:

On behalf of the American Speech-Language-Hearing Association, I write to express support for amendments to the proposed regulations that include the certification of speech-language pathology assistants and telehealth.

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 300 ASHA members reside in Wyoming.¹

ASHA appreciates that educational options include the completion of ASHA's speech-language pathology assistants (SLPA) certification program requirements. To ensure that an SLPA qualifies for ASHA's SLPA certification program, we recommend the following amendments to the sections below:

Chapter 1, Section 3. Definitions, i, Direct Supervision and I, Indirect Supervision

- Add ASHA certified to the supervision qualifications of the speech-language pathologist (SLP) or audiologist.

Chapter 12, Section 2, a, iii, A and B

- add that the 100 hours of supervised clinical field work be completed under the supervision of an ASHA certified state licensed SLP; and
- add the completion of a 1-hour ethics course, a 1-hour course in universal safety precautions, and a 1-hour course in patient confidentiality.²

Additional recommended amendments for SLPA Responsibilities include adding the following language:³

Chapter 12, Section 3, SLPA Responsibilities

(a) Service Delivery

- Exhibit compliance with the Health Insurance Portability and Accountability Act and Family Educational Rights and Privacy Act regulations, reimbursement requirements, and SLPAs' responsibilities.
- Demonstrate or share information with patients, families, and staff regarding feeding strategies developed and directed by the supervising SLP.
- Provide services under SLP supervision in another language for individuals who do not speak English and English-language learners.

(c) Prevention and Advocacy

- Present primary prevention information to individuals and groups known to be at risk for communication disorders and other appropriate groups; promote early identification and early intervention activities.
- Advocate for individuals and families through community awareness, health literacy, education, and training programs to promote and facilitate access to full participation in communication, including the elimination of societal, cultural, and linguistic barriers.
- Advocate at the local, state, and national levels for improved public policies affecting access to services and research funding.
- Participate actively in professional organizations.

Chapter 12, Section 6, Supervision

- Add that an ASHA certified SLP must supervise an SLPA in order to qualify for ASHA's SLPA certification program.

Chapter 12, Section 6, Supervision, iv, E

- Amend the language so that a supervising SLP cannot supervise more than two full-time equivalent SLPAs in any setting rather than the three that is currently proposed.⁴

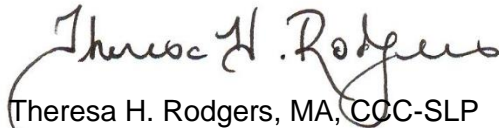
Chapter 13, Section 3, Guidelines for Use of Telehealth, iii

- Amend the assessment language so it's clear that the initial assessment of the client's candidacy for delivery of services can be conducted via electronic communications and does not have to be conducted face to face.

Requiring licensees to evaluate clients in person before initiating services would significantly limit the number of providers available to treat clients via telehealth and is counter to established evidence demonstrating the equivalence of telehealth to in-person service delivery for a wide range of diagnostic procedures.⁵

Thank you for your consideration of ASHA's position on the proposed regulations on SLPAs and telehealth. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,



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

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

² American Speech-Language-Hearing Association. (2020). ASHA Assistants Program. <https://www.ashaassistants.org/pathways-speech-language-pathology-assistant/>.

³ American Speech-Language-Hearing Association. (2019). ASHA Speech-Language Pathology Assistant Scope of Practice. <https://www.asha.org/policy/SP2013-00337/#sec1.13.1>.

⁴ Ibid.

⁵ Grogan-Johnson, S., Alvares, R., Rowan, L., & Creaghead, N. (2010). A pilot study comparing the effectiveness of speech language therapy provided by telemedicine with conventional on-site therapy. *Journal of Telemedicine and Telecare*, 16, 134–139.