



May 23, 2022

Ms. Angie Stallings
Deputy Superintendent of Policy
State Board of Education
250 E 500 S
Salt Lake City, UT 84111

RE: Educator Licensing

Dear Ms. Stallings:

On behalf of the American Speech-Language-Hearing Association, I write to provide comments on Board Rule R277-301 the proposed educator licensing requirements for audiologists, speech-language pathologists, and speech-language technicians.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 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 (SLPs) identify, assess, and treat speech, language, and swallowing disorders. Over 1,700 ASHA members reside in Utah.¹

Under the proposed regulations,

- audiologists are required to enroll in an audiology program at a regionally accredited institution of higher education that will yield a NASDTEC Stage 2 educator license, and
- SLPs are required to enroll in a regionally accredited institution of higher education to earn a master's degree or higher in speech-language pathology.

However, enrollment in such programs is no guarantee of completion. Therefore, **ASHA maintains that the possession of the higher-level degree should be the minimum requirement for these educator licenses.**

ASHA requires audiologists to earn a clinical doctoral degree to obtain the Certificate of Clinical Competence. Audiologists are highly qualified to conduct comprehensive assessments that determine hearing loss, auditory function, balance, and related systems, and evaluate, select, and dispense hearing aids. Audiologists also assess the candidacy of individuals with hearing loss for cochlear implants and work with medical teams to provide fitting, mapping, and audiologic rehabilitation to optimize the use of these devices. These educational requirements ensure that consumers in Utah receive services from the highest qualified providers.

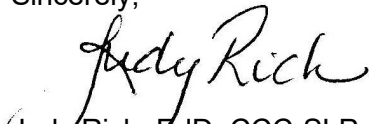
ASHA's [Council for Clinical Certification in Audiology and Speech-Language Pathology \(CFCC\)](#) awards certification in speech-language pathology to individuals who have been awarded a master's, doctoral, or other recognized post-baccalaureate degree. Certified SLPs have received the appropriate training and education to assess and treat speech, language, voice, fluency swallowing, and cognitive communication disorders in children and adults. Services provided by an appropriately trained SLP help individuals acquire speech and language skills,

recover essential skills to communicate, safely swallow, or maintain sufficient attention, memory, and organizational skills to function in their environment. Individuals that have not completed the appropriate graduate level training may not be competent to practice and safely deliver speech-language services to individuals with communication problems.²³

ASHA does support the option for speech-language technicians to complete the requirements of certified speech-language pathology assistants (SLPAs) through ASHA as a pathway to obtain a license. ASHA's certification program for SLPAs supports the option for those practicing under other titles, such as speech-language technicians, to apply for this certification as long as they meet the requirements of the program.⁴

Thank you for considering ASHA's recommendations for revisions to the educator licensing provisions. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org.

Sincerely,



Judy Rich, EdD, CCC-SLP, BCS-CL
2022 ASHA President

¹ American Speech-Language-Hearing Association. (2022). *Utah* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/utah-state-flyer.pdf>.

² American Speech-Language-Hearing Association Speech-Language Pathology Scope of Practice <https://www.asha.org/policy/sp2016-00343/>.

³ Council for Clinical Certification in Audiology and Speech-Language Pathology <https://www.asha.org/about/governance/committees/committees/council-for-clinical-certification-in-audiology-and-speech-language-pathology/>.

⁴ American Speech-Language-Hearing Association Speech-Language Pathology Assistant Certification <https://www.ashaassistants.org/pathways-speech-language-pathology-assistant/>.