



January 17, 2023

Leslie Knachel, Executive Director  
Board of Audiology and Speech-Language Pathology  
9960 Mayland Drive  
Suite 300  
Henrico, VA 23233

RE: Proposed regulation to eliminate the CCC for initial licensure

Dear Ms. Knachel:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to oppose the petition to eliminate the requirement for initial licensure applicants to hold ASHA's Certificate of Clinical Competence (CCC) and replace it with a requirement to hold a master's degree in speech-language pathology, communication disorders, speech and hearing science, or equivalent.

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, swallowing, and cognitive disorders. Over 4,720 ASHA members reside in Virginia.<sup>1</sup>

This petition would remove the requirement for ASHA's CCC and, instead, would allow for licensure through a master's degree in speech-language pathology, communication disorders, speech and hearing science, or equivalent to be a licensed speech-language pathologist. The petition makes no mention of requiring such programs to be accredited and no requirement for the clinical fellowship or national exam. It further contradicts the changes that just went into effect for audiologists.

On January 5, 2023, updated regulations went into effect to allow audiologists to use the American Board of Audiology credential in addition to ASHA's CCC to obtain an audiology license in the Commonwealth. The Board also added a pathway for audiologists to become licensed through an accredited educational program and exam. In that case, the Board chose not to make any additional changes related to the licensure of speech-language pathologists.

ASHA requests that the regulations remain as currently in place or, as an alternative, include the entire list of requirements included in the CCC as follows:

1. Holds a current and unrestricted Certificate of Clinical Competence issued by ASHA;
2. Provides documentation of graduation from a speech-language pathology program accredited by the Council on Academic Accreditation of ASHA or an equivalent accrediting body as recognized by the board;

3. Provides documentation of having passed the qualifying examination from an accrediting body recognized by the board;
4. Provides documentation of having completed a minimum of 1,260 hours and a minimum of 36 weeks of full-time mentored professional experience or its part-time equivalent.

Thank you for your consideration of ASHA's position and suggested language if the board chooses to proceed. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at [sadams@asha.org](mailto:sadams@asha.org).

Sincerely,



Robert M. Augustine, PhD, CCC-SLP  
2023 ASHA President

---

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