



August 3, 2021

Matt Freeman
Executive Director, Office of the State Board of Education
Idaho State Department of Education
650 West State Street
Boise, ID 83702

RE: ASHA Comments on Changes to Endorsement Language

Dear Mr. Freeman:

On behalf of the American Speech-Language-Hearing Association, I write to comment on the proposed changes to endorsements and certificates for audiologists and speech-language pathologists.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 900 ASHA members reside in Idaho.¹

While ASHA supports the speech-language pathology endorsement in principle, ASHA recommends amending language under 015. Idaho Educator Credential, 02. Pupil Service Staff Certificate, g. requiring that the candidate complete a "clinical fellowship supervised by an ASHA [certified](#) speech-language pathologist". The applicant for endorsement must also possess a master's degree from an accredited college or university in a speech/language pathology program approved by the State Board of Education. The clarifying language will ensure that the candidate may apply for an ASHA Certificate of Clinical Competence and have the opportunity to participate in the Audiology and Speech-Language Pathology Interstate Compact ([ASLP-IC](#)) upon its eventual adoption in Idaho. ASHA also supports the additional proposed amendment language relating to waivers for speech-language pathologists (SLPs) holding an ASHA Certificate of Clinical Competence.

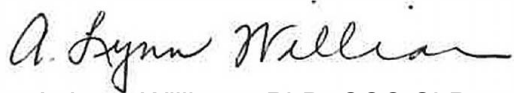
ASHA does not support the provision of an interim endorsement (or certificate) for SLPs. Under 015. Idaho Educator Credential, 02. Pupil Service Staff Certificate, h., ASHA recommends that those with a bachelor's degree pursue becoming a licensed speech-language pathology assistant until they have completed requirements for an SLP. Individuals with the endorsement do not possess the level of education and training needed to adequately assess and treat students.

ASHA supports maintaining the Certificate of Clinical Competence from ASHA under 015. Idaho Educator Credential, 02. Pupil Service Staff Certificate, i. This standard is required in many states and is an indicator of a high level of training and practice met by audiologists and SLPs throughout the country. We also recommend amending the language in this section so that the educational standard mirrors the "master's or doctoral degree with emphasis in audiology" that is included in the current Idaho licensing law. With the growing use of telepractice, possessing a doctoral degree in audiology will make practicing across state lines much easier.

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

Sincerely,

A handwritten signature in cursive script that reads "A. Lynn Williams".

A. Lynn Williams, PhD, CCC-SLP
2021 ASHA President

¹ American Speech-Language-Hearing Association. (2021). *Idaho* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/Idaho-State-Flyer.pdf>.