



October 6, 2022

Mr. Aaron West-Guillen
President, Commission on Professional Standards in Education
Nevada Department of Education
2080 E. Flamingo Rd.
Las Vegas, NV 89119-0811

RE: Proposed Speech-Language Pathology Education Changes

Dear President West-Guillen:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments on the proposed regulatory changes increasing the educational requirements for those seeking an endorsement to teach pupils, ages 3 to 21, inclusive, who have speech and language impairments in Nevada.

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. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, and swallowing disorders. Over 1,000 ASHA members reside in Nevada.¹

While supportive of the language in Sec. 3. NAC 391.370 a. for those providing services in school settings, ASHA recommends that this section be amended to reflect how these programs are currently accredited:

“Submit a transcript, which indicates the person holds a master’s degree or a more advanced degree in [an area of concentration in speech and language impairments conferred by a regionally accredited college or university] speech-language pathology, communication disorders, communication sciences or an equivalent field from an institution accredited by the Council on Academic Accreditation in Audiology and Speech-Language Pathology of the American Speech-Language-Hearing Association or equivalent and hold:

- (1) A Certificate of Clinical Competence in [speech] speech-language pathology from the American Speech-Language-Hearing Association; or
- (2) [An equivalent] A standard license or provisional license from the Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board created by NRS 637B.100.”

Accreditation by the Council on Academic Accreditation in Audiology and Speech-Language Pathology offers third party verification that the program has met standards of excellence for students entering the professions of audiology and speech-language pathology.²

ASHA also supports the exemption from the requirement to pass a competency test in the subject matter of the area of endorsement if an individual:

- is applying for an endorsement to teach pupils who have speech and language impairments and

- submits to the Department of Education official documentation indicating that he or she has received a Certificate of Clinical Competence in Audiology (CCC-A) or Speech-Language Pathology (CCC-SLP).

Nevada is the only state in the country allowing SLPs with a bachelor's degree to service children in school settings. These regulations will ensure that SLPs have received the appropriate training and education to assess and treat speech, language, swallowing, and cognitive communication disorders in children by requiring a master's in speech-language pathology. Services provided by an appropriately trained SLP help children acquire speech-language skills, and enable individuals to recover essential skills to communicate, safely swallow, or maintain sufficient attention, memory, and organizational skills to function in their environment.

Nevada has two master's level programs, which would provide the additional education needed to ensure the safety of Nevada's children. Outside of the school setting, SLPs are required to hold a master's degree and are licensed by the Nevada Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board.

Thank you for your consideration of ASHA's position to support the proposed changes for standards for SLPs in school settings. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of 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). *Nevada* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/nevada-state-flyer.pdf>.

² Council of Academic Accreditation. (n.d.). *About the CAA*. <https://caa.asha.org/about/>.