



November 6, 2023

Maria Liranzo  
Legislation, Regulations, and Budget Analyst  
Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board  
1601 Response Road, Suite 260  
Sacramento, CA 95815

RE: Continuing Education Regulations

Dear Ms. Liranzo:

On behalf of the American Speech-Language-Hearing Association, I write to express support, with proposed amendments, for the continuing education regulations for speech-language pathologists, audiologists, and dispensing audiologists, which help to ensure consumers are protected.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 15,000 ASHA members reside in California.<sup>1</sup>

ASHA supports continuing education requirements that are designed to (1) contribute to professional development and (2) lead to acquiring and enhancing skills and knowledge required for independent audiology or speech-language pathology practice. Proper professional development ensures audiologists and SLPs utilize relevant information and practices while working with clients, patients, and students. We appreciate and support your efforts to clarify continuing education regulations. We would like to offer a few amendments to the proposed regulations.

For **Section 1399.160 Definitions (a) (1)**, we recommend removing the proposed language (which includes a 70% grade or more on an assessment or exam of the course content) and substituting the language below with additional definitions.

- (a) A continuing education professional development “course” means a form of systematic learning at least one hour (60 minutes) in length, which may include academic studies, extension studies, as well as group, self-study, and hybrid delivery formats.
- (b) “Group (synchronous)” means licensees engage as a group in real time and interact with each other, the instructor, and the material.
- (c) “Self-study (asynchronous)” means licensees engage individually, with no interaction with other learners, using the same material.
- (d) “Hybrid (blended)” means licensees engage in hybrid learning experience of both group and self-study formats.

The Speech-Language Pathology and Audiology and Hearing Aid Dispensers Board’s Initial Statement of Reasons states

*“Requiring an assessment or examination to be completed at the end of the course ensures that licensees demonstrate professional learning and improved competency as a result of taking the course. Specifying that the licensee needs a grade of 70% or more is necessary because it establishes a standard of measure to quantify learning and intellectual progress. A grade of 70% or more is a reasonable requirement because it signifies satisfactory or average performance.”*

ASHA does not believe this rationale supports the 70% requirement with the evidence that informed its development. Further, the rationale does not offer evidence to support or explain why a similar requirement is not required for those course delivery formats that are not self-study. ASHA recommends that the course completion requirements for courses completed by licensees not be changed. ASHA also recommends against the implementation of the requirement for licensees to obtain a grade (regardless of the percentage) only in the circumstance where the licensee has completed self-study courses.

Within **Section 1399.160.9. Course Advertisement**, ASHA recommends adding language specifying the provider’s course delivery method (e.g., group, self-study, hybrid). We also recommend specifying that the provider publish what constitutes the course’s satisfactory completion requirements.

Thank you for considering our proposed amendments and helping to ensure that necessary continuing professional development remains in place for the professions. If you or your staff have any questions, please contact Eileen Crowe, ASHA’s director, state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).

Sincerely,



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

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