



ASHA
American
Speech-Language-Hearing
Association

January 31, 2020

Mr. Thomas Salow, Branch Chief
Arizona Department of Health Services
Division of Licensing Services
150 N. 18th Ave., Suite 400
Phoenix, AZ 85007

Dear Mr. Salow:

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

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,000 ASHA members reside in Arizona.

ASHA recommends the following proposed changes to further support the practice of audiology and speech-language pathology.

Article 2, R9-16-201, Definitions

ASHA recommends further clarification of the clinical fellowship supervisor definition to include: "d. Has a CCC while supervising a clinical fellow in state."

The current clinical fellowship supervisor definition for a speech-language pathologist is missing a provision for those having a CCC while supervising in state; it only includes those with a CCC while supervising a clinical fellow in another state.

R9-16-208, Continuing Education

ASHA recommends adding a definition for continuing education hour to read "60 minutes." A continuing education hour may have different definitions in different credit systems. ASHA recommends specifying the exact minutes for purposes of clarity.

Thank you for the opportunity to provide comments on the audiology and speech-language pathology proposed regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org.

Sincerely,

Theresa H. Rodgers, MA, CCC-SLP
2020 ASHA President