



May 20, 2019

Ms. Darcie Magnuson
Colorado Department of Regulatory Agencies
Division of Professions and Occupations
1560 Broadway, Suite 110
Denver, CO 80202

RE: Proposed Audiology Endorsement Regulations

Dear Ms. Magnuson:

On behalf of the American Speech-Language-Hearing Association, I write to provide comments on the proposed regulations for the audiology licensure by endorsement.

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 3,900 ASHA members reside in Colorado.

The Council on Academic Accreditation in Audiology and Speech-Language Pathology (CAA) is the entity within ASHA that has the authority to establish and enforce a set of standards for the accreditation of graduate education programs in audiology and in speech-language pathology. The CAA has authority to make accreditation decisions.

In the United States, 74 programs are accredited by and three programs hold candidacy status with the CAA. This includes the two clinical doctoral programs in audiology accredited by the CAA in Colorado (University of Colorado, Boulder and University of Northern Colorado).

ASHA recommends the following amendments and clarifications to the proposed regulations.

3CCR 711-2, Rule 2, Licensure by Endorsement, B

1. Earned a doctoral degree in audiology from a program, that is or, at the time the applicant was enrolled and graduated, “was offered by an institution of higher education or postsecondary education” accredited by:

ASHA recommends deleting the portion in quotes if you are connecting the program to the accreditor options, as the structure of this sentence suggests that the institution is accredited by the CAA or ACAE. These accreditors only accredit programs and not the institutions of higher education in which the program is housed.

B,1,

- a. Correct the Council on Academic Accreditation acronym from “CCA” to “CAA.”

B,1,

b. The Accreditation Commission for Audiology Education (ACAE), which is recognized by the Council for Higher Education Accreditation (CHEA) and approved by the Director.

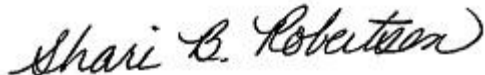
ASHA maintains that clarification is needed as to whether the condition (approved by the Director) applies only if the individual attended an ACAE accredited program. The CAA is recognized by both CHEA and United States Department of Education, but no parallel statement is indicated in B,1, a. If both sections a and b are kept, then the language needs to be modified to better inform the process.

B, 2,

b. Passed an acceptable entry-level examination or obtained a certificate of competency in audiology.

The certificate of competency should read "ASHA Certificate of Clinical Competence." We appreciate your consideration of ASHA's comments on the proposed audiology endorsement regulation. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,

A handwritten signature in cursive script that reads "Shari B. Robertson".

Shari B. Robertson, PhD, CCC-SLP
2019 ASHA President