



March 9, 2021

The Honorable Jim Burgeon, Chair
The Honorable Joyce Krawiec, Chair
The Honorable James Perry, Chair
300 N. Salisbury Street
Raleigh, NC 27603

RE: S.B. 103

Dear Chairpersons Burgeon, Krawiec, and Perry:

On behalf of the American Speech-Language-Hearing Association, I write to comment on S.B. 103, which would allow the licensure of individuals providing applied behavior analysis (ABA) services, including those associated with the treatment of autism spectrum disorder. As written, this legislation impedes the ability of licensed audiologists and speech-language pathologists to assess and treat communication disorders for individuals with autism spectrum disorder.

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 6,600 ASHA members reside in North Carolina.¹

Autism spectrum disorder (ASD) is a complex neurobiological disorder characterized by social impairment, communication difficulties, and repetitive and stereotyped behaviors for which speech-language pathologists (SLPs) play a critical role in assessing and treating. Social interaction and communication, speech production, understanding, and using spoken and written language are examples of neurodevelopmental functions. They are not solely "behaviors."

While ASHA does not oppose the licensure of applied behavior analysis, ASHA maintains that SLPs should be included in any comprehensive assessment and treatment for individuals with ASD since SLPs are able to prioritize intervention objectives and coordinate planning for communicative success. While ABA therapists may work on an individual's behaviors, SLPs have the educational background that enables them to focus on understanding and using language, social communication, literacy, speech production, and augmentative and alternative communication.

Individuals with communication disorders, and their families, must be provided with a full complement of services designed to meet their individual needs. Allowing individuals without the appropriate education and training to make assessment decisions about an individual's communication needs may result in an inaccurate assessment and inappropriate recommendations for services to the family. Utilizing a team of qualified professionals including physicians, mental health professionals, SLPs, ABA therapists, and others will ensure that an individual diagnosed with ASD receives a comprehensive assessment and the full complement of services necessary to meet their unique needs.

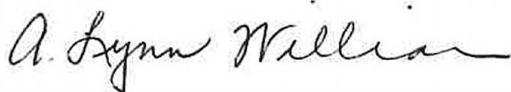
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To address these concerns, ASHA offers the following amendment to S.B. 103:

In Section 1.(a), § 90-726.2., "Definitions," add that the practice of ABA expressly excludes the assessment and treatment of communication and hearing disorders unless done in consultation with an audiologist or speech-language pathologist licensed under Chapter 90.

Thank you for your consideration of ASHA's recommended amendments to S.B. 103. If you or your staff have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at tboyd@asha.org.

Sincerely,

A handwritten signature in black ink that reads "A. Lynn Williams". The signature is written in a cursive, flowing style.

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

¹ American Speech-Language-Hearing Association. (2020). *North Carolina* [Quick Facts].
<https://www.asha.org/siteassets/uploadedfiles/North-Carolina-State-Flyer.pdf>