



March 11, 2019

The Honorable Sean Bennett  
Chairman on Labor & Employment Subcommittee  
Labor, Commerce and Industry Committee  
The Senate of South Carolina  
Columbia, SC 29202

RE: Senate Bill 330

Dear Chairman Bennett:

On behalf of the American Speech-Language-Hearing Association, I write to oppose SB 330, which could lead to the elimination or lessening of requirements for licensure of audiologists and speech-language pathologists in South Carolina.

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. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, including swallowing disorders. Over 2,700 ASHA members reside in South Carolina.

Regulatory oversight, which is legislated through occupational licensure, is the accepted practice for consumer protection. Consumers rely on the expertise of staff in the South Carolina Department of Labor, Licensing and Regulation to ensure that those in practice are held to the highest standards of the profession. **ASHA urges you to continue to require licensure for both audiologists and SLPs through this Department.**

#### **Licensure and ASHA Certification**

Both licensure and ASHA's Certificate of Clinical Competence (CCC) help ensure the quality provision of audiology and speech-language pathology services. State licensure provides consumer protection and recourse against incompetent practitioners and/or those acting in an unethical manner so that they may be removed from practice. ASHA certification is the fundamental standard among major health professions and the most widely recognized symbol of competency for audiologists (CCC-A) and SLPs (CCC-SLP). To maintain their CCC, audiologists and SLPs must accumulate 30 professional development hours every three years. Individuals holding the CCCs are expected to abide by ASHA's Code of Ethics. Certification is important for internal professional recognition and external accountability. However, licensure is also important because it provides a credential to legally work and sets minimum standards of competency that protect the public from harm.

## **Background on Audiology and Speech-Language Pathology**

### *Audiology Professional Qualifications*

Audiologists earn a clinical doctoral degree and are highly qualified to conduct comprehensive assessments for hearing loss, auditory function, balance and related systems, and evaluate, select, and dispense hearing aids. Audiologists also assess the candidacy of individuals with hearing loss for cochlear implants and work with medical teams to provide fitting, mapping, and audiologic rehabilitation to optimize the use of these devices.

### *Speech-Language Pathology Professional Qualifications*

SLPs are highly skilled professionals who, at minimum, hold a master's degree in communication disorders from an accredited program recognized by the U.S. Department of Education. SLPs complete a challenging education and training program, a supervised clinical fellowship, and must pass a nationally standardized examination. SLPs assess and treat a variety of communication disorders involving speech, language, fluency (e.g., stuttering), voice and resonance problems, cognitive communication disorders such as memory, attention and problem-solving disorders, and swallowing and associated feeding disorders. SLPs provide services in a variety of practice settings ranging from schools to institutions such as hospitals and rehabilitation centers, early intervention programs, and private practice.

We appreciate your consideration of our position concerning SB 330, and our position on the critical importance that licensure of health care professionals has on ensuring patient safety and consumer protection. If you or your staff have any questions, please contact Shannon Morey, ASHA's director of state health care and education affairs, at [smorey@asha.org](mailto:smorey@asha.org).

Sincerely,



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

cc: South Carolina Senate Labor & Employment Subcommittee