



September 22, 2020

Ms. Alison M. Nichols
Senior Fiscal Analyst
Legislative Finance Committee
325 Don Gaspar, Suite 101
Santa Fe, NM 87501

RE: ASHA Support for Continuing Licensing Board Beyond Sunset Review

Dear Ms. Nichols:

On behalf of the American Speech-Language-Hearing Association, I write in support of continuing the New Mexico Speech-Language Pathology, Audiology, and Hearing Aid Dispensing Practices Board along with the practice act for speech-language pathologists (SLPs) and audiologists, which is the responsibility of the Board.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 1,400 ASHA members reside in New Mexico.¹

Value of the Board for Licensees and Stakeholders

The regulatory oversight provided by professional licensing boards is the accepted practice for consumer protection. The New Mexico Speech-Language Pathology, Audiology, and Hearing Aid Dispensing Practices Board consists of both practitioners from the profession being regulated and consumers of the services provided. The practitioners ensure that board decisions are soundly based on the technical and scientific knowledge required to practice, as applied to individual patient care situations. The public relies on the expertise of staff at the New Mexico Regulation and Licensing Department, via the licensing board, to ensure that those in practice are held to the highest standards of the profession. ASHA recommends continuing the functions of the New Mexico Speech-Language Pathology, Audiology, and Hearing Aid Dispensing Practices Board, which oversees licensure for both audiologists and SLPs.

Promoting Safe and Effective Practice

Some of the most critical responsibilities of the Board include: ensuring that licensed practitioners follow the Practice Act Code of Ethics; providing means for review of any possible ethical violations; and monitoring completion of required continuing education to ensure that practitioners maintain best practices when treating clients with communication disorders. Additional responsibilities include:

- identifying the differences between audiologists, SLPs, and others (apprentices, teachers, and rehabilitation technicians) for employers, clients, family members, and the public;

- ensuring that only those with the appropriate qualifications and training can provide audiology and speech-language pathology services;
- deterring the hiring or substitution of other workers who do not have the necessary, accurate, and/or appropriate education, qualifications, and training;
- providing job portability by allowing those who are qualified for full licensure to work in all settings;
- enhancing recruitment of those in their clinical fellowship year, and other professionals, from other states; and
- increasing accessibility to and reimbursement from third party payer sources (such as Blue Cross/Blue Shield) who stipulate that only licensed/regulated professionals participate in their health plans.

Board Functioning and Recommended Changes to Statute

ASHA recommends that the Board add the regulation of audiology and speech-language pathology assistants to the statutes and regulations. ASHA has established a certification program for assistants and there are a variety of eligibility pathways to participate in this program.² ASHA recommends regulating audiology and speech-language pathology assistants (SLPAs) so that the New Mexico requirements are consistent with ASHA's requirements for certification.

In addition to the information that the Board currently provides on its website, ASHA recommends that the Board post, in a prominent location, the average review times for licensure processing for the various categories of licenses. ASHA also recommends that sufficient funding be allocated for the Board to carry out its administrative functions including promptly issuing licenses, addressing licensee questions, responding to consumer complaints, and promptly addressing adverse actions brought before the Board.

Licensure vs. ASHA Certification: Impact on Board Termination

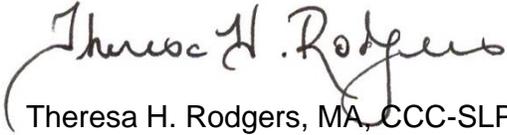
Both licensure and ASHA certification help ensure the quality provision of audiology and speech-language pathology services. State licensure provides consumer protection and recourse against incompetent practitioners and/or those acting in an unethical manner so that they may be removed from practice. 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, and as a state license option for those with their CCCs, audiologists and SLPs must accumulate 30 professional development hours every three years. Individuals holding the CCC are expected to abide by ASHA's Code of Ethics. State licensees are also expected to uphold the state code of ethics.

While certification is important for internal professional recognition and external accountability, licensure and the administration of licensure via the New Mexico Speech-Language Pathology, Audiology, and Hearing Aid Dispensing Practices Board, is critically important and provides minimum standards of competency that protect the public from harm.

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Thank you for your consideration of ASHA's support for maintaining the licensing board and the practice act it oversees. 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 black ink that reads "Theresa H. Rodgers". The signature is written in a cursive style with a large, looping initial "T".

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

¹ American Speech-Language-Hearing Association, 2020. *New Mexico* [State Quick Facts], <https://www.asha.org/uploadedFiles/New-Mexico-State-Flyer.pdf>.

² ASHA Assistants Program/ (n.d.). Become a Certified Speech-Language Pathology Assistant (SLPA). <https://www.ashaassistants.org/pathways-speech-language-pathology-assistant/>.