

October 27, 2023

Greg Searls, Executive Director Wyoming Board of Examiners of Speech-Language Pathology and Audiology 2001 Capitol Ave., Rm 127 Cheyenne, WY 82001

RE: Comments on Proposed Audiology Aides and Speech-Language Pathology Assistant Regulations

Dear Mr. Searls,

On behalf of the American Speech-Language-Hearing Association, I write to provide suggested amendments to the regulations governing audiology aides and speech-language pathology assistant regulations.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders. Over 400 ASHA members reside in Wyoming.¹

ASHA supports the use of appropriately trained and supervised audiology assistants and speech-language pathology assistants (SLPAs) and believe they can greatly contribute to meeting the needs of patients and clients, particularly in areas of the state impacted by practitioner shortages.

In response to the proposed regulations, we offer the following suggested amendments.

Supervision of Aides and Audiometric Technicians, Chapter 11

- Section 5 c (i): This language currently reads as "Carry out prescriptive programming for individuals and groups." Additional language needs to be added indicating if this is referring to a plan of care or if prescriptive programming is for a hearing device.
- **Section (d) (1)**: ASHA recommends amending this language to read "Conduct hearing screenings such as pure-tone air conduction screening, otoacoustic emission screening, and screening auditory brain response without interpretation."
- **Section (d) (iii):** Within the language "Carry out prescriptive aural habilitation and rehabilitation programming," ASHA believes clarification is needed for the term "prescriptive" to indicate if this is referring to the licensee or the audiologist.

Speech-Language Pathology Assistant, Supervision, Chapter 12

- Section 6 (a) (iv): We recommend that the supervising SLP have their ASHA
 Certificate of Clinical Competence and have completed a minimum of 2 hours of
 professional development/continuing education in clinical instruction/supervision to
 align with ASHA's 2020 Standards for ASHA SLPA Certification.²
- **Section 6 (b)**: This language currently reads "Each supervising SLP shall uphold the ethics and professionalism of ASHA." We recommend adding "as required under the ASHA Certificate of Clinical Competence."

Thank you for considering ASHA's suggested amendments to the proposed changes to the audiology aide and speech-language pathology assistant regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,

Robert M. Augustine, PhD, CCC-SLP 2023 ASHA President

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¹ American Speech-Language-Hearing Association. (2022). Wyoming [Quick Facts]. https://www.asha.org/siteassets/advocacy/state-fliers/wyoming-state-flyer.pdf

² American Speech-Language-Hearing Association. (2020). 2020 Standards for ASHA Speech-Language Pathology Assistants Certification. https://www.asha.org/certification/2020-slpa-certification-standards/