

December 6, 2023

The Honorable Christina Henderson Committee on Health Council of the District of Columbia 1350 Pennsylvania Avenue, NW Washington, DC 20004

RE: B25-0545

Dear Councilmember Henderson:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to oppose language in B25-0545 which would merge the Board of Audiology and Speech-Language Pathology with unrelated professions.

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. SLPs identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders. Over 430 ASHA members reside in the District of Columbia.1

The existence of autonomous licensing boards plays a crucial role in safeguarding consumers and practitioners. Most states oversee the regulation of audiology and speech-language pathology through a regulatory board comprised of professionals from these fields as well as consumer representatives. Specifically, 41 states have established such regulatory boards to uphold high standards of practice and promptly investigate instances of harm.²

Combining the Board of Audiology and Speech-Language Pathology with the Boards of Occupational Therapy, Physical Therapy, and Recreational Therapy to establish a new Board of Rehabilitative Therapies may diminish the input of practitioners within the board's functions. Currently, the Board is comprised of two audiologists and three SLPs. The suggested restructuring would shift this representation to just two members, potentially excluding either profession from representation altogether. Such a generalized approach raises concerns about the effective safeguarding of consumers relying on speech and hearing services in the District. The suggested formation of an 11-member board, with more than half of its members lacking familiarity with the practices of audiology and speech-language pathology, amplifies these deficiencies when overseeing matters related to those professions.

ASHA appreciates your consideration of our position on B25-0545 and urges you to reconsider the merging of these boards. If you or your staff have any questions, please contact Susan Adams. ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,

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

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¹ American Speech-Language-Hearing Association. (2022). *District of Columbia* [Quick Facts]. https://www.asha.org/siteassets/advocacy/state-fliers/district-of-columbia-flyer.pdf

² National Council of State Boards of Examiners (2019). *Reference Manual: Licensure and Regulation in Speech-Language Pathology and Audiology*. http://www.ncsb.info/publications