

December 18, 2025

Ms. C. Denise Brown
North Carolina Board of Examiners for Speech-Language Pathologists and Audiologists
PO Box 16885
Greensboro, NC 27416

RE: Speech-Language Pathology Assistant Regulations

Dear Ms. Brown:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to comment on the proposed regulations for speech-language pathology assistants (SLPAs) and to recommend amendments.

ASHA is the national professional, scientific, and credentialing association for 241,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 7,400 ASHA members reside in North Carolina.¹

Between 2022 and 2032, North Carolina is expected to have a 19% increase in demand for SLPs.² We believe that licensing appropriately trained and supervised SLPAs can help to address this increased demand, alleviate staff shortages, and tackle the critical needs of those with communication and related disorders. As such, we offer the following recommended changes to the proposed regulations.

While North Carolina requires registration for SLPAs, ASHA recommends licensure, which many states already require.³ Nineteen states currently require licensure for SLPAs in school settings, and 21 states require licensure for SLPAs outside of school settings.⁴

21 NCAC 64.1003 Licensee Requirements

ASHA believes that there is a need for language regarding a supervisory plan. Currently (e) (1) includes a “treatment plan” written by the primary supervising SLP. However, there is no provision for a “supervisory plan” for the SLPA. This plan would ensure that the SLP maintains the highest standard of quality care for students, patients, and clients. A written supervisory plan is a tangible way to document progress and outline the practices of the supervising SLP and the SLPA. Even with a supervisory plan, care of the student, patient, or client remains the supervisor’s responsibility.

Therefore, we recommend adding the language below to address this:

“The supervising SLP is responsible for designing and implementing a supervisory plan.”

The SLP supervisor, in developing this plan, will need to consider the SLPA's competencies and skill levels in treating students, patients, and clients who have a variety of communication disorders. ASHA’s SLPA scope of practice recommends that data on every student, patient, and

client serviced by the SLPA should be reviewed by the supervisor at regular intervals and can be considered “indirect supervision.” Supervisors should arrange the supervision schedule so that all students, patients, and clients receive direct contact with the supervising SLP.⁵

ASHA also has concerns about the specificity of the current treatment plan language included in (e) (2) because it doesn’t give much leeway to the SLP. The behavioral approach that is currently specified may not be applicable for all types of treatment.

Telepractice

ASHA’s SLPA scope of practice supports the use of telepractice.⁶ The current provisions of the North Carolina regulations also allow for telepractice by the SLPA under the supervision of the licensed provider.

Thank you for considering ASHA’s comments on the SLPA regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA’s director of state education affairs, at ecrowe@asha.org.

Sincerely,



A. B. Mayfield-Clarke, PhD, CCC-SLP
2025 ASHA President

¹ American Speech-Language-Hearing Association. (2025). *North Carolina* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-flyers/north-carolina-state-flyer.pdf>

² Ibid.

³ American Speech-Language-Hearing Association. (n.d.). *School Assistants Trends*. <https://www.asha.org/siteassets/advocacy/school-assistants-trends.pdf>

⁴ American Speech-Language-Hearing Association. (n.d.). *State Legislative & Regulatory Policies*. <https://www.asha.org/advocacy/state/state-policies/>

⁵ American Speech-Language-Hearing Association. (2022). *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <https://www.asha.org/policy/slpa-scope-of-practice/>

⁶ American Speech-Language-Hearing Association. (2022). *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <https://www.asha.org/policy/slpa-scope-of-practice/>