



June 10, 2026

Ms. Wanda Rawlinson
Alabama Board of Examiners for Speech-Language Pathology and Audiology
P.O. Box 304760
Montgomery, AL 36130-4760

RE: Audiology Assistant and SLPA Requirements

Dear Ms. Rawlinson:

On behalf of the American Speech-Language-Hearing Association (ASHA), we write to express support for the proposed regulations amending the requirements of audiology assistants and speech-language pathology assistants (SLPAs) and to recommend a number of amendments to strengthen the language and protections under this profession.

ASHA is the national professional, scientific, and credentialing association for 247,000 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 3,000 ASHA members reside in Alabama.¹

ASHA supports the use of appropriately trained and supervised audiology assistants and SLPAs to address the critical needs of students, patients, and clients across work settings. We recommend the following amendments to the proposed regulatory changes to support these professionals and the supervisors who oversee them.

Audiology Assistants

We recommend updating supervision requirements under 870-X-2-.06 (e) to allow for remote telesupervision of audiology assistants by adding a direct supervision definition for them that states:

“Direct supervision means in-view observation and guidance provided, either in person or through telesupervision, by a supervising audiologist or speech-language pathologist to an assistant, provisional licensee, or student while they perform an assigned activity. Direct supervision activities may include observing, coaching, modeling, and providing real-time assistance and feedback.”

SLPAs

Licensure

We recommend amending these regulations to substitute “registration” for SLPAs with “licensure.” This would be consistent with the term used in the Code of Alabama Section 34-28A-21.1 and would help eliminate confusion for practitioners and consumers.

Scope of Practice

Section 870-X-2-06 (b) and (c):

We recommend removing the duties allowed and prohibited for in this section as this is duplicative language for SLPAs. The Code of Alabama Section 34-28A-21.1 currently states:

“A speech-language pathology assistant shall have a scope of practice as defined by the American Speech-Language-Hearing Association.”

Supervision

(e) Assistant Supervision

We recommend that the 100% supervision requirement only apply to SLPAs treating medically fragile students, patients, or clients. We also recommend adding the following language to this section:

“The amount and type of supervision required must be consistent with (a) the assistant skills and experience; (b) the needs of the students, patients, and clients; (c) the service setting; (d) the tasks assigned.”²

This language is consistent with ASHA’s SLPA Scope of Practice.³ An ASHA ad hoc committee developed this Scope of Practice. This committee included ASHA-certified SLPs and SLPAs with specific knowledge and experience working with/as support personnel in clinical practice in schools, health care, and/or private practice settings.

Exam

While not currently included in the statutory requirements, the Board may wish to establish exam requirements for SLPAs upon completion of their academic practicum and clinical hours. ASHA’s requirement of an exam supports the need for consistency through a national benchmark for SLPA competency; aids in public protection; ensures understanding of scope, supervision, and appropriate practice; and provides objective evidence of SLPA competencies

Assistants Title Protection

(d) Assistant Titles

We recommend strengthening this section of the regulations by adding the additional language below:

“No person shall hold themselves out to be, or use the title audiology assistant or speech-language pathology assistant, unless they are licensed by the state to practice as such.”

Thank you for considering ASHA’s comments on the proposed audiology assistant and SLPA regulatory changes. If you or your staff have any questions, please contact:

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American Speech-Language-Hearing Association
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Submitted on behalf of the American Speech-Language-Hearing Association

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

² American Speech-Language-Hearing Association. *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <https://www.asha.org/policy/slpa-scope-of-practice/#Supervision-of-SLPAs>

³ Ibid