



**ASHA**  
American  
Speech-Language-Hearing  
Association

February 23, 2026

The Honorable Robert Bierman  
The Honorable Jeff Backer  
Health Finance and Policy Committee  
Minnesota House of Representatives  
100 Rev Dr Martin Luther King Jr Blvd  
Saint Paul, MN 55155

RE: HF 2590

Dear Representatives Bierman and Backer:

On behalf of the American Speech-Language-Hearing Association (ASHA), I am writing to express concerns about HF 2590, as introduced, which licenses art therapists. The language in this bill contains broad and overreaching definitions that directly infringe upon the established scope of practice for speech-language pathologists (SLPs).

ASHA is the national professional, scientific, and credentialing association for 247,000 members, certificate holders, and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 4,000 ASHA members reside in Minnesota.<sup>1</sup>

Specifically, ASHA identifies the following areas of infringement in the "Scope of Practice" (Sec. 148B.82).

### **Infringement on Cognitive and Communication Treatment**

The bill authorizes art therapists to develop treatment plans for "cognitive" and "developmental" disorders and to use art to "enhance neurological, cognitive, and verbal abilities." SLPs are the primary health care professionals trained to diagnose and treat cognitive-communication disorders, including those resulting from stroke, traumatic brain injury, or developmental delays.

### **Alternative Modes of Communication**

The bill specifies the use of interventions to "facilitate alternative modes of receptive and expressive communication... that can circumvent the limitations of verbal articulation." This language directly mirrors the practice of Augmentative and Alternative Communication (AAC), which is a core, specialized competency of speech-language pathology. Determining the appropriate "alternative mode" for a patient with a communication disability requires the specific diagnostic expertise of an SLP.

### **Assessment and Diagnosis**

The bill allows clinical art therapists to perform "evaluation, assessment, [and] diagnosis." Without clear "exemption" or "limitation" language, this could be interpreted as allowing art therapists to assess speech and language functions under the guise of art-based evaluation.

SLPs complete rigorous graduate education, supervised clinical fellowships, and national certification grounded in the science of speech, language, and cognition. Allowing other professions to claim "enhancement of verbal abilities" or the "facilitation of alternative

communication" as part of their primary scope without comparable clinical and educational preparation creates real risks for patient safety and the quality of rehabilitative care.

ASHA respectfully requests that HF 2590 be amended to include language to (1) explicitly state that nothing in the act shall be construed to authorize a clinical art therapist to practice speech-language pathology as defined in Minnesota Statutes and (2) clarify that "facilitating communication" in an art context does not include the clinical treatment of communication disorders or the prescription of AAC systems. We recommend the following language:

The practice of art therapy does not include the screening, diagnosis, or assessment of any communication disorder.

When providing educational or health care services, an art therapist may not replace the services provided by an audiologist or a speech-language pathologist.

Unless authorized to practice speech-language pathology, art therapists may not evaluate, examine, instruct, or counsel on speech, language, communication, and swallowing disorders and conditions.

An individual licensed as an art therapist may not represent to the public that the individual is authorized to treat a communication disorder. However, a licensed art therapist may work with clients who have a communication disorder but not for the purpose of providing treatment for the communication disorder. They may support the communication goals determined by a speech-language pathologist while doing art therapy.

We urge the legislature to refine this bill to ensure that the scope of clinical art therapy is distinct and does not compromise the specialized services provided by Minnesota's licensed SLPs.

Thank you for your time and consideration of these critical professional concerns. 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](mailto:sadams@asha.org).

Sincerely,



Linda I. Rosa-Lugo, EdD, CCC-SLP  
2026 ASHA President

---

<sup>1</sup> American Speech-Language-Hearing Association. (2025). *2025 Member & Affiliate Profile*. <https://www.asha.org/siteassets/surveys/2025-asha-member-and-affiliate-profile.pdf>