



1925-2025
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December 23, 2025

Erin Haag, Executive Director
Board of Examiners for Speech-Language Pathology and Audiology
800 NE Oregon St
Portland, OR 97232

RE: Rulemaking to Remove Conditional License and Amend SLPA Regulations

Dear Ms. Haag:

On behalf of the American Speech-Language-Hearing Association (ASHA), I am writing to comment on the rulemaking to remove the conditional license and subsequently the supervised clinical experience and amendments to the speech-language pathology assistants (SLPA) regulations. While we appreciate the goal of streamlining the process and reducing administrative burden for new practitioners, we oppose the proposed change to grant full licensure solely based on academic degree and a passing Praxis score as it would significantly limit access to care and compromise professional mobility. Additionally, we would like to offer amendments to the SLPA regulations to bring them in line with current practice.

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 support personnel; 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 disorders. Over 2,500 ASHA members reside in Oregon.¹

Conditional Licensure and the Supervised Clinical Experience

The primary mission of the Board is to protect the public. To achieve this, the existing conditional Speech-Language Pathologist (C-SLP) process, which requires the supervised clinical experience (SCE), serves as a critical and essential bridge between academic training and professional practice. While a master's degree provides foundational knowledge, it simply cannot replicate the administrative, documentation, and decision-making complexities required in a full-time, real-world professional setting.

The postgraduate SCE provides C-SLPs with the opportunity for full immersion and consolidation of skills, allowing academic learning to evolve into ethical professional practice. During this period, supervisors are essential, guiding new professionals in complex tasks such as managing billing and scheduling, navigating interprofessional teams, writing comprehensive reports, and handling ethical dilemmas. The current requirement that supervisors track and verify competency ensures meaningful mentorship, not just the fulfillment of time. In high-need settings like rural schools, the lack of mandated supervision

will likely result in inconsistent mentorship, leading to professional isolation and potentially compromising the quality of care for vulnerable populations.

We appreciate the Board's dedicated efforts in regulating the profession. However, concerns regarding administrative costs, late fees, or difficult documentation do not warrant the elimination of this foundational public protection measure. To further support the SLP community, we recommend exploring ways to clarify and streamline administrative and supervisory processes. Specific areas for consideration include simplifying the C-SLP application, upgrading procedures, and reinforcing clear communication regarding critical deadlines.

The C-SLP license and its associated SCE are a necessary step in ensuring that all fully licensed SLPs in Oregon are competent, ethical, and ready for practice. We strongly urge the Board to maintain this essential requirement and direct its efforts toward improving the clarity and efficiency of the existing C-SLP administrative process.

SLPA Regulations

Additionally, we would like to offer suggested amendments to the state's SLPA regulations to align with ASHA's Speech-Language Pathology Assistants Certification (C-SLPA) and current best practice.

OAR 335-095-010: Definitions

ASHA recommends deleting the proposed language for OAR 335-095-010 (d) and replacing it with the language below from the ASHA C-SLPA pathway options:

- College degree (associate's or bachelor's) from an accredited institution, and
- Complete an SLPA certificate program with equivalent coursework, or complete academic coursework from an accredited college institution, in the areas below:
 - Introductory or overview course in communication disorders
 - Phonetics
 - Speech sound disorders
 - Language development
 - Language disorders
 - Anatomy and physiology of speech and hearing mechanisms

ASHA recommends changing the term "consultative supervision" to "indirect supervision," which is a clearer and more commonly used term nationwide and also aligns with ASHA's SLPA scope of practice.²

OAR 335-095-0030: Certification of Speech-Language Pathology Assistants

We recommend adding language under OAR 335-095-0030 (2)(b) specifying that clinical hours may be completed via a clinical practicum or on the job under the supervision of a licensed SLP who currently holds the Certificate of Clinical Competence and meets the ASHA supervision requirements or meets equivalent standards. We also recommend the following edit for additional clarification:

- “Clinical fieldwork must consist of a minimum of 100 clock hours of clinical interaction and 8 hours of feedback, consultation, and assessment over a recommended 8-12 week period...”

Additionally, while OAR 335-095-0030 (2)(c) allows for the clinical interaction to be completed within seven years prior to the date the SLPA applies for a license, ASHA’s C-SLPA requires SLPAs to complete these hours within five years of applying for their C-SLPA. We also believe that allowing multiple supervisors of an SLPA in OAR 335-095-0030 (d) can lead to discontinuity and potential lack of understanding of the skill level of the SLPA.

OAR 335-095-0050: Requirements for Supervising Licensed Speech-Language Pathology Assistants

We recommend the following additional language in OAR 335-095-0030 (1) to be consistent with ASHA’s SLPA scope of practice:

- (1) “The amount and type of supervision required will be based on the skills and experience of the speech-language pathology assistant, the needs of the students, patients, and clients, the service setting, and the tasks assigned.”

We recommend the following change in OAR 335-095-0030 (7)(b) to align with ASHA’s SLPA scope of practice:

“(b) During the exemption period, a licensed Speech-Language Pathologist may supervise up to four full-time equivalent certified Speech-Language Pathology Assistants.”

OAR 335-095-0060: Scope of Duties for the Speech-Language Pathology Assistant

ASHA recommends adding language in OAR 335-095-0060 (1)(b) regarding supervision for the medically fragile, per ASHA’s SLPA scope of practice:

“(b) Provide direct treatment assistance, excluding dysphagia. Provide feeding for nutritional purposes and provide direct treatment to medically fragile students/patients/clients, to meet communication needs in the areas of augmentative communication, cognitive rehabilitation, life skills, expressive and receptive communication, as deemed appropriate by the supervising speech-language pathologist. One-hundred percent direct supervision (synchronous or “live” telesupervision is acceptable) of SLPAs for medically fragile students, patients, or clients is required.

ASHA recommends adding language to the scope of duties to better align with the more comprehensive ASHA’s SLPA scope of practice so that areas such as cultural and linguistic supports—including working with multilingual students, patients, clients, and their families—are included. We also recommend further aligning with the ASHA’s SLPA scope of practice to provide additional specifics on SLPA limitations such as “selecting AAC systems or devices.”

Other Comments

We recommend adding the language below to address title protection for SLPAs.

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

Lastly, ASHA recommends adding language that addresses how the Board will accept SLPAs coming from other states with equivalent standards.

Thank you for your time and dedication to protecting the health and welfare of Oregon residents. 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,



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

¹ American Speech-Language-Hearing Association. (2024). *Oregon* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-flyers/oregon-state-flyer.pdf>

² 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/>