



March 30, 2026

The Honorable Brian Collamore
Chair, Senate Committee on Government Operations
115 State Street
Montpelier, VT 05633-5301

RE: Speech-Language Pathology Assistant Licensure

Dear Senator Collamore and Members of the Senate Committee on Government Operations:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to comment on H. 588 and express support for licensing speech-language pathology assistants (SLPAs) without requiring a new Sunrise Report.

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 assistants and SLPAs; and students. Over 500 ASHA members reside in Vermont.¹

According to the Bureau of Labor Statistics, demand for SLPs in Vermont is projected to increase by 19% between 2022 and 2032.² ASHA believes that licensing SLPAs who are appropriately trained and supervised can help alleviate provider shortages and improve access to services for individuals with communication-related disorders across the state.

Licensure also provides important consumer protections by establishing minimum qualifications and oversight for individuals delivering care. Currently, 39 states regulate assistants/aides working in school settings, clinical settings, or both, demonstrating a strong national precedent for SLPA regulation.

Following are ASHA's recommended amendments to H. 588.

Education, Clinical Practicum, and Exam

ASHA recommends adding these education requirements to Section 4457 to align with current best practice. This language provides three pathway options for SLPAs:

- "A two-year degree in a speech-language pathology assistant program from an accredited institution; or
- A bachelor's degree in communication sciences and disorders from an accredited institution; or
- A college degree in another field from an accredited institution with coursework in the following areas:
 - Introductory or overview course in communication disorders
 - Phonetics
 - Speech sound disorders
 - Language development
 - Language disorders
 - Anatomy and physiology of speech and hearing mechanisms"

We also recommend clarifying SLPA clinical hours using the language below:

“Complete 100 hours of clinical field work as a speech-language pathology assistant student or a speech-language pathology assistant under the supervision of a licensed speech-language pathologist who has completed a minimum of two hours of professional development in clinical instruction/supervision. The speech-language pathology assistant clinical hours may be completed via clinical practicum or on the job.”

ASHA also recommends the following addition to Section 4457:

“Upon completion of their academic practicum and clinical hours, a speech-language pathology assistant must pass any applicable exam prescribed in the rules by the Director.”

As a side note, the ASHA Assistants Certification Exam is only available through the C-SLPA process. It is not a standalone exam.

Scope of Practice

ASHA recommends defining the SLPA scope of practice allowances and restrictions to align with ASHA's Scope of Practice for SLPAs. ASHA developed this scope by analyzing current practice standards, national certification requirements, methods of academic and clinical training (from academic program directors, clinical educators, etc.), and feedback from stakeholders in communication sciences and disorders.

Telesupervision

We also recommend including provisions for telesupervision to provide additional flexibility for both the SLPA and the SLP supervisor. Telesupervision enables SLPs to effectively oversee SLPAs in rural and remote areas, addressing geographic barriers, workforce shortages, and limited access to in-person services. By using secure technology to provide guidance, monitor services, and ensure quality care, telesupervision promotes equitable access while maintaining professional standards and supporting assistant development.

The definition of telesupervision should include the following:

“The speech-language pathologist can view and communicate with the patient and speech-language pathology assistant in real time via telecommunication software, webcam, telephone, and similar devices and services to supervise the speech-language pathology assistant. This does not include reviewing a recorded session later.”

Other Supervision

ASHA recommends defining direct and indirect supervision and including a ratio of SLPA to SLP supervision. We recommend that the SLP not supervise, or be listed as a supervisor for, more than three full-time equivalent SLPAs in any setting. The requirements should reflect that the number of SLPAs who can be appropriately supervised by a single SLP will depend on a variety of factors, including caseload characteristics, SLPA experience, and SLP experience. There can be wide variability of skills and experience of SLPAs, and supervisor demands can fluctuate. As the SLP's supervisory responsibility increases, overall responsibilities will change because the

SLP is responsible for students, patients, and clients as well as supervision of the SLPA(s). Therefore, adequate time for direct and indirect supervision of the SLPA(s) and caseload management must be allotted as a critical part of the SLP's workload.

Continuing Education and Title Protection

We also recommend specifying continuing education requirements for license renewal or reinstatement as well as the following title protection:

“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.”

Reciprocity

Finally, we recommend including language that addresses how you will accept those coming from other states with equivalent standards.

Thank you for considering ASHA's support for SLPA licensure. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state education affairs, at ecrowe@asha.org.

Sincerely,



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

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

² Ibid