

February 7, 2024

Attn: Amy McPeek, Director Oklahoma Board of Examiners for Speech-Language Pathology and Audiology 3700 N. Classen Blvd, Suite 248 Oklahoma City, OK 73118

RE: Proposed SLPA Regulations

Dear Ms. McPeek:

On behalf of the American Speech-Language-Hearing Association, I write to express support, with amendments, for the proposed speech-language pathology assistant (SLPA) regulations.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 2,600 ASHA members reside in Oklahoma.¹

ASHA supports the use of appropriately trained and supervised SLPAs and believe they can contribute to meeting the needs of client and patients, particularly in areas of the state impacted by practitioner shortages. In response to the proposed regulations, we offer the following suggested amendments, which are aligned with ASHA's Assistants Certification Program.²

690:10-7-3. Supervision Required

(b) ASHA recommends deleting the <u>underlined</u> language as we do not specify course content areas for the SLPA supervisor. We recommend adding the language in red, which is consistent with ASHA's Scope of Practice for SLPAs. The nine months of speech-language pathology experience mentioned below should include a nine-month Clinical Fellowship followed by nine months of experience. ASHA suggests reducing the six-hour requirement of Board approved training to two hours, as six hours is overly burdensome for practitioners. This would align the language with ASHA's requirements for the supervising SLP.

The supervising speech-language pathologist must have successfully completed at least six two hours of Board approved training in clinical supervision within ten years prior to requesting approval to supervise. Three hours must include instruction in the knowledge and skills areas necessary for speech-language pathology assistant's supervisors as identified by the American Speech-Language Hearing Association (ASHA), other organization or entity the Board deems acceptable. The remaining three hours may consist of other topics related to clinical supervision, including instruction specific to the supervision of clinical fellows. A speech-language pathologist who has completed six two hours of training is eligible to supervise both clinical fellows and speech-language pathology assistants., provided that the six hour training

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includes three hours specific to supervision of clinical fellows and three hours specific to supervision of assistants. The supervising speech-language pathologist should also hold the ASHA Certificate of Clinical Competence in Speech-Language Pathology and complete a minimum of nine months of experience after being awarded ASHA certification prior to beginning their supervision.³

ASHA recommends adding the additional supervision clarifications in red below as well as replacing the existing language by amending it with the language in red below.

- (c) One hundred percent direct supervision of speech-language pathology assistants is required for medically fragile clients, patients, or students required. This includes synchronous or live telesupervision.⁴
- (e) The supervising speech-language pathologist and the speech-language pathology assistant are each responsible for knowing:
 - (1) Professional standards for speech-language pathology assistant, include, but are not limited to objectives for scope of practice, ethics, supervision, and professional practices.
 - (2) Service delivery practices and instructional methods that are within the scope of practice for a speech-language pathology assistant.

690:10-7-9. Requirements for assistants (a) Academic requirements for speech-language pathology assistants

B Technical content

ASHA supports maintaining the existing academic requirements of this section for SLPAs. Removing these requirements would not only increase the burden on SLP supervisors but could also put consumers at risk.

C Clinical Experience

We recommend deleting the <u>underlined</u> language below, as hours currently completed through an accredited academic institution would satisfy the 100 clock hours requirement.

- (C) Clinical experience. Applicants must complete 100 clock hours of clinical experience supervised by a licensed speech-language pathologist. <u>The clinical experience requirement</u> must be completed by one of the following
- (i) <u>completion of clinical experience through an accredited academic institution with an approved speech-language pathology assistant program; or</u>
- (ii) completion of Clinical Fellowship; or
- (iii) completion of clinical experience through American Speech-Language Hearing Association (ASHA) assistant certification.

Waiver of Transcript

ASHA Comments

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ASHA supports the waiver of transcript requirements for SLPAs holding the ASHA SLPA Certification (C-SLPA).

Reciprocity

We support the reciprocity provisions, which includes holding a current ASHA assistant certification. However, we recommend adding back in "speech-language pathology" for clarity purposes in number 2.

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

Sincerely,

Tena L. McNamara, AuD, CCC-A/SLP

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2024 ASHA President

¹ American Speech-Language-Hearing Association. (2022). *Oklahoma Quick Facts*. Oklahoma State Flyer (asha.org)

² American Speech-Language-Hearing Association. (n.d.). ASHA Assistants Program. https://www.asha.org/assistants-certification-program/

³ American Speech-Language-Hearing Association. (2022). *Scope of Practice for Speech-Language Pathology Assistants*. Scope of Practice for the Speech-Language Pathology Assistant (SLPA) (asha.org)
⁴ ibid