

March 6, 2023

The Honorable Robert Morgan 401 S. Spring St. Stratton Office Building Springfield, IL 62706-4000

RE: Assistant Licensure; HB 2274

Dear Representative Morgan:

On behalf of the American Speech-Language-Hearing Association, I write to express overall support for HB 2274 (with our recommended amendments provided below), which amends the Illinois Speech-Language Pathology and Audiology Practice Act to waive the 100-hour supervised field work requirement for certain licensed speech-language pathology assistants.

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 support personnel; and students. Over 9,000 ASHA members reside in Illinois.<sup>1</sup>

ASHA supports the language in Section 225 ILCS 110/8.6(a), stating the requirement of 60 semester credit hours with an awarded associate degree, which is consistent with ASHA's Speech-Language Pathology Assistants Certification (C-SLPA). Additionally, ASHA's C-SLPA accepts practicum or "on the job" experience with an ASHA certified supervisor who meets Standard III.<sup>2</sup> However, ASHA does not support the current language in Section 225 ILCS 110/8.6(a)(2). **ASHA recommends amendments indicating that an SLPA is supervised by a licensed and ASHA certified SLP**, so the assistant can be eligible for ASHA's C-SLPA.

In Section 225 ILCS 110/8.6(a)(3), supervison requirements are listed as percentages. However, ASHA's current Scope of Practice for Speech-Language Pathology Assistants provides the following guidance for supervision:

"Supervision must be based on (a) the needs, competencies, skills, expectations, philosophies, and experience of the SLPA and the supervisor; (b) the needs of students, patients, and clients served; (c) the service setting; (d) the tasks assigned; and (e) other factors. More intense supervision, for example, would be required in such instances as the orientation of a new SLPA; initiation of a new program, equipment, or task; or a change in student, patient, or client status (e.g., medical complications). Functional assessment of the SLPA's skills with assigned tasks should be an ongoing, regular, and integral element of supervision."<sup>3</sup>

Therefore, ASHA recommends amending the current langauge in this section to better reflect ASHA's guidance for supervision as provided above.

ASHA Comments Page 2

ASHA supports employing appropriately supervised and trained SLPAs as long as they are working under the supervision of licensed SLPs. Use of assistants can help alleviate shortages of practitioners and decrease the list of responsibilities currently falling on SLPs in Illinois who are serving those with critical needs in a variety of settings. Currently, 16 states license support personnel outside of school settings, while 10 states regulate support personnel solely in school settings.<sup>4</sup>

Thank you for helping to further ensure that the citizens of Illinois have access to speech services, which will help them participate in daily living activities and maximize their engagement in social situations. If you or your staff have any questions, please contact Doanne Ward-Williams, ASHA's director, state affairs, at <u>dwardwilliams@asha.org.</u>

Sincerely,

Robert Maugustine

Robert M. Augustine, PhD, CCC-SLP 2023 ASHA President

<sup>1</sup> American Speech-Language-Hearing Association. (2022). *Illinois* [Quick Facts]. https://www.asha.org/siteassets/advocacy/state-fliers/illinois-state-flyer.pdf.

<sup>2</sup> American Speech-Language-Hearing Association. (2022). 2020 Standards for ASHA Speech-Language Pathology Assistants Certification. <u>https://www.asha.org/certification/2020-slpa-certification-standards/</u>.

<sup>3</sup> American Speech-Language-Hearing Association. (2022). *Speech-language pathology assistant scope of practice* [Scope of Practice]. <u>https://www.asha.org/policy/slpa-scope-of-practice/#Responsibilities</u>.

<sup>4</sup> American Speech-Language-Hearing Association. (n.d.). *Support Personnel Excluding School Settings*. <u>https://www.asha.org/siteassets/uploadedfiles/support-personnel-excluding-school-settings.pdf</u>.