



June 10, 2020

Jennifer Hawk, Board Administrator  
Board of Speech, Audiology and Hearing  
35 State House Station  
Augusta, ME 04333

RE: Proposed Amendment to Speech Language Pathology Assistant Regulation

Dear Ms. Hawk:

On behalf of the American Speech-Language-Hearing Association, I write to provide comments in support on the proposed amendment to the speech language pathology assistant regulations, which clarifies educational requirements for licensed speech-language pathology assistants (SLPAs).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 900 ASHA members reside in Maine.

ASHA appreciates that Maine is moving from registration of SLPAs to licensure. ASHA maintains that a licensure process helps the state identify SLPAs who are qualified to serve individuals with communication disorders and ensure the highest consumer protection. ASHA appreciates the addition of provisions clarifying the educational requirements for SLPAs, including an associate's or bachelor's degree in communication disorders from an accredited institution. ASHA recommends that there be a requirement for 100 hours of field work—supervised by a licensed and ASHA certified speech-language pathologist (SLP) for both graduates of associate's and bachelor's degree programs. This requirement would enable SLPAs to qualify for the ASHA assistant certification program.

ASHA's certification program for SLPAs and audiology assistants will be become available this fall.<sup>1</sup> The program provides three educational pathway options for SLPAs:

### **EDUCATION OPTION 1**

Completion of a minimum 2-year SLPA program degree from an accredited institution (e.g., associate's degree from a community college, technical training program, certificate program, or bachelor's degree).

### **EDUCATION OPTION 2**

- Bachelor's degree in communication sciences and disorders from an accredited institution
- Complete ASHA's Online SLPA Education Modules or equivalent<sup>2</sup>

### **EDUCATION OPTION 3**

- College degree (associate's or bachelor's) from an accredited institution

- Pass 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
- Complete ASHA's Online Assistant Education Modules or equivalent<sup>3</sup>

ASHA's SLPA Certification program also requires the completion of the following:

- 1-hour of ethics course;
- 1-hour course in universal safety precautions;
- 1-hour patient confidentiality training course; and
- a minimum of 100 hours of clinical field work under the supervision of an ASHA certified SLP.

ASHA certification requires high standards and appropriate supervision to ensure that the SLPA is successful. ASHA recommends that there be 30% of supervised time weekly (20% of that must be direct supervision for the first 90 days of employment). Direct supervision is defined as on-site, in-view observation and guidance by a certified SLP while an assigned activity is performed by an SLPA. After the first 90 workdays the amount of supervision can be adjusted if the supervising SLP determines the SLPA has met appropriate competencies and skill levels with a variety of communication and related disorders.

ASHA also recommends 100% direct supervision of SLPAs for medically fragile students, patients, or clients.

Under scope of responsibilities, ASHA recommends the following be added to the list of what an **SLPA can do**:

- self-identify as SLPAs to families, students, patients, clients, staff, and others (verbally, in writing, and/or with titles on name badges);
- exhibit compliance with the Health Insurance Portability and Accountability Act (HIPAA) and the Family Educational Rights and Privacy Act (FERPA) regulations, reimbursement requirements, and SLPAs' responsibilities;
- assist the SLP with bilingual translation during screening and assessment activities exclusive of interpretation; refer to Issues in Ethics: Cultural and Linguistic Competence;<sup>4</sup>
- provide guidance and treatment via telepractice to students, patients, and clients who are selected by the supervising SLP as appropriate for this service delivery model;
- demonstrate or share information with patients, families, and staff regarding feeding strategies developed and directed by the SLP;
- serve as interpreter for patients, clients, students, and families who do not speak English;
- provide services under SLP supervision in another language for individuals who do not speak English and English-language learners;
- assist with departmental operations (scheduling, recordkeeping, safety/maintenance of supplies and equipment);

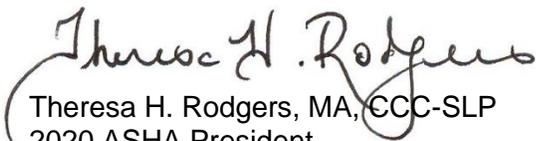
- present primary prevention information to individuals and groups known to be at risk for communication disorders and other appropriate groups; promote early identification and early intervention activities;
- advocate for individuals and families through community awareness, health literacy, education, and training programs to promote and facilitate access to full participation in communication, including the elimination of societal, cultural, and linguistic barriers;
- provide information to emergency response agencies for individuals who have communication and/or swallowing disorders; and
- advocate at the local, state, and national levels for improved public policies affecting access to services and research funding.

Under scope of responsibilities, ASHA recommends the following be added to the list of what an **SLPA cannot do**:

- perform procedures that require a high level of clinical acumen and technical skill (e.g., vocal tract prosthesis shaping or fitting, vocal tract imaging, oral pharyngeal swallow therapy with bolus material);
- tabulate or interpret results and observations of feeding and swallowing evaluations performed by SLPs;
- provide interpretative information to the student, patient, client, family, or others regarding the status or service;
- develop or determine the swallowing strategies or precautions for students, patients, clients, family, or staff;
- treat medically fragile students, patients, and clients independently; and
- design or select augmentative and alternative communication systems or devices.

Thank you for considering ASHA's position and comments on the proposed speech language pathology assistant regulations. If you or your staff have any questions, please contact Susan Adams, ASHA's director, state legislative and regulatory affairs, at [sadams@asha.org](mailto:sadams@asha.org).

Sincerely,



Theresa H. Rodgers, MA, CCC-SLP  
2020 ASHA President

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<sup>1</sup> American Speech-Language-Hearing Association Assistants Program. (n.d.). *Speech-Language Pathology Assistants Certification: Eligibility Pathways*. Retrieved from <https://www.ashaassistants.org/pathways-speech-language-pathology-assistant/>.

<sup>2</sup> Available prior to program launch in late 2020.

<sup>3</sup> These three courses must be completed no more than 2 years prior to application. These requirements may also be met as part of an academic course.

<sup>4</sup> American Speech-Language-Hearing Association. (2017). *Issues in Ethics: Cultural and Linguistic Competence*. Retrieved from <https://www.asha.org/Practice/ethics/Cultural-and-Linguistic-Competence/>.