



August 24, 2020

Ms. Patty Salazar, Executive Director
Colorado Department of Regulatory Agencies
Division of Professions and Occupations
Office of Speech-Language Pathology Certification
1560 Broadway, Suite 1350
Denver, CO 80202

RE: Comments on Certification by Endorsement and Accredited Programs

Dear Ms. Salazar:

On behalf of the American Speech-Language-Hearing Association, I write to recommend amendments to the proposed certification by endorsement regulations for speech-language pathologists and amendments to the language relating to programs accredited by the Council on Academic Accreditation as part of the implementation of HB 20-1326 and SB 20-102.

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 (SLP); speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 4,000 ASHA members reside in Colorado.¹

ASHA supports the certification by endorsement language in section 1.64, A, B, and C. However, it is not clear whether the language in Section 1.64 D is to be interpreted to require 1, 2, and 3 or whether these are standalone requirements. If they are requiring SLPs to meet all of these, then we believe the language is overly restrictive, beyond what ASHA requires, and would make it especially difficult for some highly qualified SLPs to obtain this certification in Colorado. For an SLP to be ASHA certified they must have a master's, doctoral, or other recognized post-baccalaureate degree with all graduate coursework and graduate clinical experience required in speech-language pathology to have been initiated and completed in a Council for Academic Accreditation (CAA) accredited program or in a program with CAA candidacy status. They must also complete a speech-language pathology clinical fellowship and 20 Certification Maintenance Hours, or 3.0 ASHA continuing education units of professional development during every three year maintenance interval beginning with the 2020-2022 maintenance interval. The requirements in D also go beyond what is required for a regular speech-language pathology certification in Colorado. Consequently, ASHA recommends adding "or" as **bolded** below:

D. "In addition to meeting the requirements set forth in Rules 1.1 through 1.3, an applicant for certification by endorsement must demonstrate competency to practice speech-language pathology. To demonstrate competency an applicant must submit, in a manner required by the Director, information establishing that the applicant:

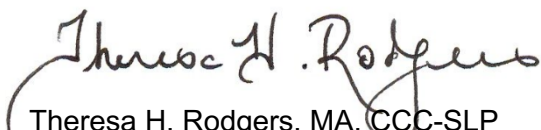
1. Has actively practiced as a speech-language pathologist for at least 400 hours within a twelve-month period during the three years immediately preceding the application; **or**
2. Has completed, during the two years immediately preceding the application, forty-eight hours of continuing education that:
 - a. Relates to the practice of speech-language pathology; and
 - b. Meets the approval of the Director; **or**
3. Holds a current Certificate of Clinical Competence (CCC) granted by the American Speech-Language-Hearing Association in speech-language pathology; or
4. Has otherwise maintained competency as a speech-language pathologist, as determined by the Director.”

Furthermore, in Section 1.20, Provisional Speech Language Pathology Certification, ASHA recommends amended language as **bolded** below. This amended section ensures that any speech-language pathology programs in candidacy with the Council on Academic Accreditation at Colorado universities will be covered.

“1. Successfully completed a master’s or higher degree in communication sciences and disorders granted by an accredited institution of higher education recognized by the United States department of education. An applicant is presumed to have met the requirements of this paragraph if the applicant has successfully completed a master’s or higher degree in a speech-language pathology program that is accredited by **or in candidacy with** the **Council on Academic Accreditation** of the American Speech-Language-Hearing Association or its successor association; and...”

Thank you for your consideration of ASHA’s proposed amendments to the Certification by Endorsement and the Provisional Speech-Language Pathology Certification regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA’s director, state association relations, at ecrowe@asha.org

Sincerely,


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

¹American Speech-Language-Hearing Association. (2020). *Colorado State Flyer*.
<https://www.asha.org/uploadedFiles/Colorado-State-Flyer.pdf>