



ASHA
American
Speech-Language-Hearing
Association

September 28, 2020

Ms. Elena Kemp
Regulatory Coordinator
Colorado Department of Regulatory Agencies
Division of Professions and Occupations
1560 Broadway, Suite 1350
Denver, CO 80202

RE: Comments on Supporting Continued Regulation of Speech-Language Pathologists

Dear Ms. Kemp:

On behalf of the American Speech-Language-Hearing Association, I write to support continuing the regulation of speech-language pathologists and offer proposed amendments to the existing regulations.

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

Licensure and ASHA Certification

Both licensure and ASHA certification help ensure the quality provision of speech-language pathology services. All states, with the exception of Colorado, regulate speech-language pathology via licensure. While Colorado uses the term “certification” for speech-language pathology, it is substantially equivalent to most state licensure requirements. State licensure provides consumer protection and recourse against incompetent practitioners and/or those acting in an unethical manner so that they may be removed from practice.

ASHA’s Certificate of Clinical Competence (CCC) is the fundamental standard among major health professions and the most widely recognized symbol of competency for speech-language pathologists (CCC-SLP). To maintain their CCC, SLPs must accumulate 30 professional development hours every three years. Individuals holding the CCC are expected to abide by ASHA’s Code of Ethics. While, certification is important for internal professional recognition and external accountability, licensure is important to legally work and provides minimum standards of competency that protect the public from harm. In Colorado, continuing professional competency may be shown through participating in the Continuing Professional Development Program; participating in a program of continuing professional competency through an accrediting body or an entity approved by the Director; or by receiving an exemption for military service.

Examination Requirement

ASHA recommends deleting the examination requirement language below in bold from the new Section 1.5 A. 2:

Has passed an examination that, in the Director's determination, is substantially equivalent to the examination approved by the American Speech-Language-Hearing Association or its successor association, subject to the requirements of paragraph (B) of this Rule.

ASHA maintains that the existing language below, allowing an applicant to be eligible for certification if they have completed one of the following, is sufficient:

1. Passed the national examination approved by the American Speech-Language-Hearing Association or its successor association or
2. Holds a current Certificate of Clinical Competence (CCC), granted by the American Speech-Language-Hearing Association or its successor association, in speech-language pathology.

Speech-Language Pathology Professional Qualifications and Autonomous Practice

SLPs are autonomous professionals who work directly with clients, patients, and students making independent judgments regarding the assessment and treatment of an individual's communication disorder. SLPs are highly skilled professionals with a minimum of a master's degree in communication disorders, completion of a supervised clinical fellowship, and passage of a nationally standardized examination.

Benefits of Licensure

Some of the benefits of licensure for SLPs, are:

- Protecting individuals of all ages who need the services of SLPs
- Identifying the differences between SLPs and others (para professionals, assistants, teachers, and rehabilitation techs) for employers, clients, family members, and the public
- Ensuring that only those with the appropriate qualifications and training can provide speech pathology services
- Deterring the hiring or substitution of other workers who do not have the necessary, accurate, and/or appropriate education, qualifications, and training
- Providing job portability by allowing those who are qualified for full licensure to work in all settings
- Enhancing recruitment of those in their Clinical Fellowship Year and other professionals from throughout the country
- Deterring unethical behavior from professionals and employers, such as under/over utilization, fraud, and misrepresentation
- Allowing a venue for professionals to express concerns regarding those in the profession who may be unethical in their practice
- Providing a venue for consumers to seek censure for individuals who have committed malpractice or other unethical behavior
- Providing the necessary authority to intervene in cases of provider misconduct

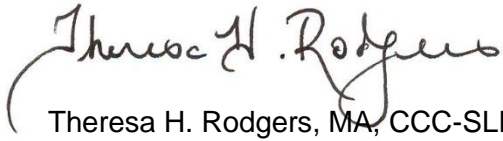
September 28, 2020

Page 3

- Increasing accessibility to and reimbursement from third party payer sources (such as Blue Cross/Blue Shield) who stipulate that only licensed/regulated professionals may participate in their plans

Thank you for your consideration of ASHA's comments supporting the continuing regulation of speech-language pathology. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Theresa H. Rodgers". The signature is written in a cursive style with a large, sweeping initial "T".

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

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