



Submitted via email: [mack.williams@llr.sc.gov](mailto:mack.williams@llr.sc.gov)

October 19, 2021

Mack Williams, Administrator  
Board of Speech-Language Pathology and Audiology  
South Carolina Department of Labor, Licensing and Regulation  
P.O. Box 11329  
Columbia, SC 29211

RE: Proposes Regulations, Chapter 115

Dear Administrator Williams:

On behalf of the American Speech-Language-Hearing Association, I write to comment on the proposed changes to Chapter 115-1, 115-2, and 115-3, which alter the application requirements and scope of practice for Speech-language Pathology Assistants (SLPAs), and the requirements for the Supervised Professional Employment (SPE).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 3,000 ASHA members reside in South Carolina.<sup>1</sup>

ASHA supports the Board of Speech-Language Pathology and Audiology's following changes to the SLPA application and training requirements, including accepting ASHA's Speech-Language Pathology Assistants Certification (C-SLPA) as evidence of completing supervised clinical fieldwork.

### **Proposed Changes to 115-1, SLPA Application Requirements**

The Board proposes adding section (E) to 115-1, which requires an applicant whose license is expired to submit a new application, provide evidence of continuing education earned within the last two years (16 hours for an audiologist or speech-language pathologist (SLP), and 8 hours for an SLPA), and meet all licensure requirements in effect at the time of their application. ASHA supports this change as it ensures that providers with lapsed credentials maintain appropriate training and education before reentering the workforce.

### **Proposed Changes to 115-2, SLPA Training Requirements**

The Board proposes amending 115-2 to require SLPAs to present evidence of a supervised clinical experience that consists of 100 clock hours of supervised clinical fieldwork to be completed as part of an academic program, on-the-job training in another state, in accordance with a board-approved training plan, or through acquiring ASHA's Speech-Language Pathology Assistant Certification. ASHA supports this change as it maintains South Carolina's strong training requirements for SLPAs while allowing flexibility for

applicants who previously worked in a different state or completed an academic program that does not provide supervised clinical fieldwork.

### **Proposed Changes to 115-2, SLPA Scope of Practice**

The Board proposes amending 115-2 to prohibit SLPAs from participating in feeding or swallowing activities. ASHA supports this amendment as it is consistent with ASHA's scope of practice for SLPAs.<sup>2</sup>

However, ASHA recommends expanding the definition of "feeding or swallowing activities" to clarify the prohibited activities while detailing certain activities *related* to feeding and swallowing that are permissible. For example, ASHA maintains that the following activities should be expressly prohibited:

- perform standardized or non-standardized diagnostic tests, formal or informal evaluations, or swallowing screenings/checklists;
- perform procedures that require a high level of clinical acumen and technical skill (e.g., vocal tract prosthesis shaping or fitting, vocal tract imaging, and oral pharyngeal swallow therapy with bolus material);
- tabulate or interpret results and observations of feeding and swallowing evaluations performed by SLPs; and
- develop or determine the swallowing strategies or precautions for patients, family, or staff.

ASHA does support SLPAs conducting the following activities:

- provide information to emergency response agencies for individuals who have communication and/or swallowing disorders; and
- demonstrate or share information with patients, families, and staff regarding feeding strategies developed and directed by the SLP.

ASHA has the following concerns about the Board's proposed changes to its SPE supervision requirements.

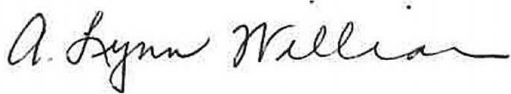
### **Proposed Changes to 115-3, SPE/SLPA Supervisor Qualifications**

The Board proposes amending 115-3 to require SPE supervisors to have a minimum of three years of full-time work experience as a licensed audiologist or SLP. While ASHA supports the Board's intent to ensure newly licensed professionals cannot immediately begin supervising SPE applicants, the proposed requirements go beyond what is appropriate to ensure fully licensed audiologists and SLPs are properly trained before entering the workforce. Moreover, the three-year requirement could delay the licensure of newly qualified professionals due to bottlenecks in completing the SPE and render South Carolina's rules incompatible with those in other states (most states only require full licensure or ASHA certification to qualify as a Clinical Fellow supervisor).<sup>3</sup>

Therefore, we recommend that the Board alter this regulation to be consistent with ASHA's Clinical Fellowship mentor qualifications. Under ASHA requirements, supervisors must have nine months of full-time experience (or its part-time equivalent) working as an audiologist or SLP after being awarded certification and must have completed two hours of professional development in supervision.<sup>4</sup>

Thank you for your consideration of ASHA's comments on the Board's proposed regulatory changes. If you or your staff have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at [tboyd@asha.org](mailto:tboyd@asha.org).

Sincerely,



A. Lynn Williams, PhD, CCC-SLP  
2021 ASHA President

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<sup>1</sup> American Speech-Language-Hearing Association. (2020). *South Carolina* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/South-Carolina-State-Flyer.pdf>.

<sup>2</sup> American Speech-Language-Hearing Association. (2019). Speech-Language Pathology Assistant (SLPA) Scope of Practice. <https://www.asha.org/siteassets/publications/sp2013-00337.pdf>.

<sup>3</sup> Audiologists and SLPs must still meet ASHA's CF requirements to earn ASHA Certification.

<sup>4</sup> American Speech-Language-Hearing Association. (2021). A Guide to the ASHA Clinical Fellowship Experience. <https://www.asha.org/certification/clinical-fellowship/#qual-mentor>.