



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

March 8, 2018

The Honorable Karen Spilka
Chair
Senate Committee on Ways and Means
24 Beacon St.
Room 212
Boston, MA 02133

RE: SB 135

Dear Chairwoman Spilka:

On behalf of the American Speech-Language-Hearing Association, I write to recommend a modification to SB 135, which establishes licensure for providers of applied behavioral analysis (ABA).

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 5,200 of our members reside in Massachusetts.

ASHA recommends that Section 5, Chapter 112, Section 266, be amended to include “communication assessment and treatment” to the list of services that are not in the scope of practice of ABA providers.

Autism spectrum disorder (ASD) is a complex neurobiological disorder characterized by social impairment, communication difficulties, and repetitive and stereotyped behaviors. Social interaction and communication, speech production, understanding and using spoken and written language are examples of neurodevelopmental functions and are not solely “behaviors.” Speech-language and social communication impairments are the core features of individuals with ASD for which speech-language pathologists (SLPs) play a central role in assessment and treatment.

SLPs complete a comprehensive education program that meets rigorous standards of practice based on objective methodology, which includes the following:

- A master’s or doctoral degree with 75 semester credit hours in a course of study addressing the knowledge and skills pertinent to the field of speech-language pathology, as determined, validated, and systematically updated using a skills validation process.
- A minimum of 400 clock hours of supervised clinical experience in the practice of speech-language pathology, with supervision provided by individuals holding the ASHA Certificate of Clinical Competence (CCC).

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- A passing score, determined by a cut score analysis, on a national examination administered and validated by the Educational Testing Service.
- Completion of a supervised Clinical Fellowship to meet the requirements of the CCC, the recognized standard in the field.
- State licensure (SLPs are regulated in all 50 states and the District of Columbia).
- Completion of 30 hours of professional development activities every three years.

ASHA maintains that SLPs should be identified as appropriate service providers for individuals with ASD, as speech-language pathologists are able to prioritize intervention objectives and coordinate planning for communicative success. While ABA therapists may work on an individual's behaviors, SLPs focus on understanding and use of language, social communication, literacy, speech production, and augmentative and alternative communication (AAC). Utilizing a team of qualified professionals including physicians, mental health professionals, behavioral therapists, SLPs, among other qualified professionals, will ensure that the individual diagnosed with ASD will have a comprehensive assessment and receive the full complement of services necessary to meet his/her unique needs.

Thank you for your consideration of ASHA's recommendation on SB 135. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,

A handwritten signature in cursive script that reads "Elise Davis-McFarland".

Elise Davis-McFarland, PhD, CCC-SLP
2018 ASHA President