



**ASHA**

American  
Speech-Language-Hearing  
Association

Submitted via email: [HouseExecutiveDepartmentsandAdministration@leg.state.nh.us](mailto:HouseExecutiveDepartmentsandAdministration@leg.state.nh.us)

December 30, 2021

The Honorable Carol McGuire  
House Executive Departments and Administration Committee  
New Hampshire General Court  
LOB Room 306  
Concord, NH 03301

RE: House Bill 1016

Dear Representative McGuire and Members of the Committee:

On behalf of the American Speech-Language-Hearing Association, I write to oppose HB 1016, which would reduce educational requirements for licensed speech-language pathologists in New Hampshire by allowing individuals who do not have a master's degree in communication disorders to obtain a license and use the title of speech-language pathologist.

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 1,000 ASHA members reside in New Hampshire.<sup>1</sup>

ASHA opposes HB 1016 because it would allow applicants with a master's degrees in a related field and certification by the Department of Education as a speech language specialist to apply for licensure as a speech-language pathologist (SLP). Although SLPs work closely with individuals who hold other educational degrees, their education does not qualify them to act as SLPs.

Licensed SLPs are uniquely educated and trained to assess and treat speech, language, swallowing, and cognitive communication disorders in children and adults. These services help children acquire language and enable people to recover essential skills to communicate about their health and safety, to swallow adequate nutrition safely, and to have sufficient attention, memory, and organizational skills to function in their environment.

Licensed SLPs complete a comprehensive education program that meets rigorous standards of practice based on objective methodology, which includes the following:<sup>2</sup>

- A master's or doctoral degree in communication sciences and disorders or speech-language pathology 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, which includes:**
  - 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).

- 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.

This bill would allow speech language specialists, who have a master's degree in special education or elementary education, among others, to be licensed by the Speech Language Pathology Board without having met all the requirements for licensure that apply to other applicants. These requirements for licensure to practice speech-language pathology in HB 1016 are not in line with ASHA certification or with the licensure requirements in the remaining 49 states and the District of Columbia. Therefore, individuals who have fulfilled these requirements in New Hampshire would not be eligible for ASHA certification nor could they work in any other state or the District of Columbia.

In addition, this Committee passed legislation (SB 133) that was signed into law earlier this year, which would allow New Hampshire to participate in the Audiology & Speech-Language Pathology Interstate Compact (ASLP-IC). If HB 1016 were to pass as written, New Hampshire may have problems around their participation in the ASLP-IC.

In order to clarify the bills intention, we would like to offer the following amendment to replace the current bill language:

326-F:3-a Speech-Language Specialist Eligibility for Initial Licensure.

I. The board shall issue a speech-language specialist license which limits practice to applicants working in the public schools to any person who:

(a) On or after [date], an individual hired by a public school system, State approved nonpublic school for children with disabilities, or chartered educational institution of the State or the State Department of Education to practice speech-language pathology shall be licensed in accordance with this Act.

(b) On [date], an individual employed by a public school system, State approved nonpublic school for children with disabilities, or chartered educational institution of the State or the State Department of Education to practice speech-language pathology who does not otherwise meet the qualifications set forth in this Act, may be licensed to practice speech-language pathology as long as they are practicing continuously on and after [date] while performing the duties of that employment.

Ed 507.23 School Speech-Language Specialist shall be expired effective [date]

2 Effective Date. This act shall take effect 60 days after its passage

Thank you for your consideration of ASHA's comments on HB 1016. 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](mailto:sadams@asha.org).

Sincerely,



December 14, 2021  
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A. Lynn Williams, PhD, CCC-SLP  
2021 ASHA President

cc: Tina Kelley, Office of Professional Licensure and Certification

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

<sup>2</sup> American Speech-Language-Hearing Association. (2020). *2020 Standards and Implementation Procedures for the Certificate of Clinical Competence in Speech-Language Pathology*. <https://www.asha.org/Certification/2020-SLP-Certification-Standards/>.