



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

April 18, 2018

The Honorable Nellie Pou
Chairwoman
Senate Commerce Committee
New Jersey Senate
P.O. Box 001
Trenton, NJ 08625

RE: A. 2183

Dear Senator Pou and Members of the Committee:

On behalf of the American Speech-Language-Hearing Association, I write in opposition to the proposed legislation as written, A. 2183, which ASHA believes unnecessarily licenses music therapists.

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 6,600 of our members reside in New Jersey.

In order to remove our opposition, ASHA respectfully requests the following changes to the proposed legislation.

Under the definition of music therapy, we request the language to include text in *italics* below:

The practice of music therapy does not include the diagnosis of any physical, mental, or *the diagnosis or assessment, of a communication disorder or provide treatment of a communication disorder unless it is under the supervision of and following the treatment plan developed and approved by the speech-language pathologist or audiologist.*

Before providing music therapy services to a client ~~for~~ *with a communication disorder*, a ~~speech, language, voice, fluency, cognitive-linguistic, or swallowing disorder~~ the licensed professional music therapist shall collaborate, ~~as applicable~~, with the client's speech-language pathologist or audiologist to review the client's diagnosis treatment needs, and treatment plan [Emphasis added]

During the provision of music therapy services to a client ~~for~~ *with a communication disorder*, a ~~speech, language, voice, fluency, cognitive-linguistic, or swallowing disorder~~ the licensed professional music therapist shall collaborate, ~~as applicable~~, with the client's speech-language pathologist or audiologist *and follow the treatment plan developed and approved by the speech-language pathologist or audiologist.* [Emphasis added]

Speech-Language Pathologists: Professionals Trained to Assess and Treat Communication Disorders

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 individuals 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.

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).
- 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.

Below is a comparison of core courses and electives for entry-level SLPs and entry-level music therapists that are specific to areas of communication. SLPs undergo rigorous training across all aspects of communication as they earn their master’s degree. Although training programs vary among universities, a typical master’s program will include the option to take the courses indicated below. **The core training for music therapy, which requires only a bachelor’s degree, is minimal and provides only an overview of communication disorders which does not address specific treatment standards and methods.**

Core Course Comparisons

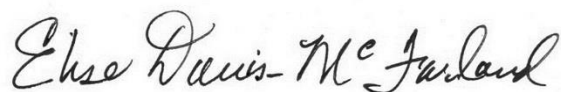
Topic Area	Speech-Language Pathologists	Music Therapists
Language	Option to take courses in 25 different areas, such as: <ul style="list-style-type: none"> • psychology of language • linguistics • language disorders of children • aphasia • developmental neuroscience • phonological development and disorders • clinical phonology 	Introduction to speech and hearing process disorders

Topic Area	Speech-Language Pathologists	Music Therapists
	<ul style="list-style-type: none"> • language acquisition • disorders of speech sounds • communication for individuals with autism 	
Cognitive Assessment	Option to take courses in 18 different areas, such as: <ul style="list-style-type: none"> • developmental language disorders • neurogenic disorders of language • language training • language of school-age children • degenerative disorders • medical speech-language pathology 	Introduction to speech and hearing process disorders
Swallowing	Option to take courses in 20 different areas, such as: <ul style="list-style-type: none"> • craniofacial disorders • dysphagia • head and neck cancer • motor speech disorders • communication disorders in children with medical and developmental needs • neuroscience • speech science 	<ul style="list-style-type: none"> • Introduction to speech and hearing process disorders • Anatomy and physiology

ASHA maintains that SLPs are the only professionals who can appropriately assess and plan treatment for individuals with communication disorders. Therefore, ASHA urges you to address these concerns with the proposed legislation to ensure that music therapists are not delivering services they are not qualified to provide.

Thank you for the opportunity to submit comments on A. 2183. If you or your staff have any questions, please contact Susan Adams, ASHA’s director of state legislative and regulatory advocacy, at sadams@asha.org.

Sincerely,



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

* American Speech-Language-Hearing Association. (2016). *2014 Standards and Implementation Procedures for the Certificate of Clinical Competence in Speech-Language Pathology*. Retrieved from <http://www.asha.org/Certification/2014-Speech-Language-Pathology-Certification-Standards/>.