



AMERICAN
SPEECH-LANGUAGE-
HEARING
ASSOCIATION

May 17, 2018

Mr. Greg Searls
Board of Examiners of Speech-Language Pathology and Audiology
2001 Capitol Ave., Room 103
Cheyenne, WY 82002

Dear Mr. Searls:

On behalf of the American Speech-Language-Hearing Association, I write to oppose the proposed regulations allowing aides to apply to become speech-language pathology assistants (SLPAs) without completing the SLPA degree requirements.

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 300 of our members reside in Wyoming.

The proposed regulations allow an aide registered with the licensure board for at least two years to apply for SLPA certification and allows for the ongoing renewal of the aide's certification for those who have not completed the necessary educational training.

Typically, aides possess a high school diploma or GED equivalent while beginning the process of obtaining an associate degree SLPA training programs or equivalent. ASHA maintains that aides should meet the existing Wyoming SLPA certification standards including an associate degree or a bachelor's degree in communication disorders or speech-language pathology, that requires a minimum of 15 credit hours in clinical related coursework in order to receive SLPA certification. Additionally, SLPAs they should meet the requirement for the 100 hours of supervised fieldwork or its equivalent clinical practicum.

ASHA is currently developing a certification program for SLPAs and audiology assistants. ASHA guidelines recommend specific coursework and fieldwork, with an associates or bachelor's degree that includes the following:

General Education: Coursework that typically includes, but is not limited to:

- Oral and written communication, including grammar and usage, composition or business writing, and public speaking. Such communication skills must be demonstrated to meet the level of workplace standards expected for the field of speech-language pathology.
- Mathematics, including at least one course in general mathematics, business mathematics, accounting, algebra, or higher level mathematics.
- Technology, including computer literacy, word processing, other software applications, web-based applications, and managing digital audio and video files.

- Social and natural sciences, including psychology, sociology, biology, and/or human anatomy and physiology; physics or other sciences, as applicable.

Technical Content: Course content provides students with background information in communication disorders and technical knowledge to assume the job responsibilities and core technical skills for SLPAs and typically includes the categories:

- Overview of normal processes of communication, including normal speech, language, communication, and hearing development; phonetics; and communication across the life span.
- Overview of communication disorders, including introduction/survey to communication disorders and coursework in both speech disorders and language disorders.
- Overview of the anatomy and physiology of the speech and hearing mechanism.
- Instruction in assistant-level service delivery practices, including technical procedures for SLPAs, ethics for the practice of speech-language pathology, and procedures and processes about assisting the speech-language pathologist (SLP) in service delivery.
- Instruction in workplace behaviors, including:
 - relating verbally and nonverbally to clients/caregivers in a pragmatic, supportive, and appropriate manner that considers the developmental, educational, cultural, and communication needs of these individuals;
 - accepting and implementing the supervisor's feedback and instructions and seeking clarification as needed;
 - maintaining confidentiality and ensuring the security of client information and records at all times;
 - communicating effectively in oral and written formats that conform to speech-language pathology workplace standards of intelligibility and legibility and are consistent with state and federal regulations and instructions from the supervising SLP;
 - following health and safety precautions, including universal precautions and other workplace procedures designed to provide a safe environment for clients and others.
- Cultural and linguistic factors in communication, including one or more of the following: language and culture, interpersonal communication (verbal and nonverbal), sign language and other manually coded systems, bilingualism, or other multicultural issues.

Observation: Observation experiences include direct, on-site observation of an ASHA-certified SLP. Additional observation experiences may include pre-approved (by the supervising SLP) on-site or video observation of an ASHA-certified SLP.

Fieldwork Experience (a minimum of 100 clock hours is recommended): Fieldwork provides appropriate experiences for learning the job responsibilities and workplace behaviors of the SLPA, under the supervision of an ASHA-certified SLP. These experiences are not intended to develop independent practice.*

Speech aides who have not completed the above coursework, observation, and field experience are not prepared to work with individuals who have multiple and complex communication disorders. Without the appropriate training and supervision, speech aides may put clients/patients at risk.

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Thank you for the opportunity to provide comments on these proposed regulations. ASHA urges the Board to revise the proposed regulations to require minimum education, observation, and fieldwork to ensure that those individuals serving as SLPAs have the appropriate skills to provide supervised treatment to clients with communication disorders. 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 cursive script that reads "Elise Davis-McFarland".

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

* American Speech-Language-Hearing Association. (n.d.). *Speech-Language Pathology Assistants Practice Portal; Educational and Training Requirements*; retrieved from https://www.asha.org/PRPSpecificTopic.aspx?folderid=8589934664§ion=Key_Issues.