

July 17, 2020

Melody Anthony
Chief Operating Officer
State Medicaid Director
Oklahoma Health Care Authority
4345 N. Lincoln Blvd.
Oklahoma City, OK 73105

Dear Director Anthony:

On behalf of the American Speech-Language-Hearing Association, I write to offer comments on the Oklahoma Medicaid State Plan Amendment (SPA)-20-0020, Therapy Assistants, effective January 1, 2021.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 211,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. In Oklahoma, ASHA represents nearly 2,500 ASHA members and works in close collaboration with the affiliated Oklahoma Speech-Language-Hearing Association.¹

While ASHA recognizes the broad differences between the scope of practice of speech-language pathology assistants (SLPAs) and fully credentialed speech-language pathologists (SLPs) and understands a payment reduction for assistants, ASHA opposes the Amendment's proposal to apply an equal payment reduction to the Clinical Fellows (CFs), who are licensed (interim) speech-language pathologists. Differences in qualifications and licensure requirements clearly support a higher rate of reimbursement for CFs.

Licensure for SLPAs requires a two-year associate's technical degree. The SLPA assists with specific aspects of the speech-language program while receiving onsite supervision of their clinical service delivery. By comparison, the CF has a master's degree in Communication Sciences and Disorders, has completed the requisite 400 hours of practical training experience, and has passed a nationally standardized exam ensuring their full competence to practice professionally and with broad clinical independence. The CF, having completed graduate education and embarking on a professional career as an SLP, is able to operate within the broad clinical scope of practice outlined by state statute and regulation.

The SLPA licensure in Oklahoma requires that one must:

1. Hold a minimum of an associate's degree or provide equivalent academic coursework and clinical training hours for an SLPA;
2. Be licensed by the Oklahoma Board of Examiners for Speech-Language Pathology and Audiology (OBESPA);
3. Be employed by an Oklahoma public school; and
4. Partner with an OBESPA-licensed SLP who has agreed to attend supervision training and will provide supervision and training to the SLPA.

Statutory and regulatory requirements are:

1. Before the Board grants authorization for an individual to be designated a speech-language pathology assistant, the Board will consider the academic training and clinical experience of the applicant, the specific duties and responsibilities he is assigned, the amount and nature of the supervision that is available, and the number of such other persons assigned to the proposed supervisor.
2. All applicants must hold at least an associate's degree, or equivalent, with a major emphasis in speech-language pathology from an accredited academic institution.
3. Applicants must complete 100 clock hours of clinical experience supervised by an SLP who has been fully licensed for a minimum of two years.
4. Under direct supervision, all client's patients are directly supervised by the supervisor. In addition to required direct and indirect supervision, the supervising SLP must be available by electronic means at all times when the assistant is performing clinical activities.
5. The supervising SLP must have been fully licensed for two years.
6. A licensed SLP may not supervise any more than two assistants.
7. Assistant licenses shall be for a period of one year.
8. A minimum of 20 clock hours of continuing education is required every two years.

By comparison, the post-graduate clinical fellowship year begins only **after** all requirements for graduation have been completed, as outlined in the ASHA SLP Certification Standards, including all prerequisite coursework (Standard IV-A), core coursework (Standard IV-C), and supervised clinical practicum (Standard V).²

SLP Licensure in Oklahoma in accordance with 690:10-3, 10-4, 10-5, 10-7³

1. Academic Requirements – Degree –Each speech-language pathology applicant shall hold not less than a master's degree, or its equivalent, with a major emphasis in speech-language pathology from an accredited academic institution offering a graduate program in speech-language pathology.
2. Specific knowledge must be demonstrated in the following areas:
 - a. Articulation;
 - b. Fluency;
 - c. Voice and resonance, including respiration and phonation;
 - d. Receptive and expressive language (phonology, morphology, syntax, semantics, and pragmatics) in speaking, listening, reading, writing, and manual modalities;
 - e. Hearing, including the impact on speech and language;
 - f. Swallowing (oral, pharyngeal, esophageal, and related functions, including oral functions for feeding; orofacial myofunction);
 - g. Cognitive aspects of communication (attention, memory, sequencing, problem-solving, executive functioning);
 - h. Social aspects of communication (including challenging behavior, ineffective social skills, lack of communication opportunities); and
 - i. Communication modalities (including oral, manual, augmentative, and alternative communication techniques and assistive technologies).
3. Supervised clinical practicum – 400 clock hours of supervised clinical practicum.
4. All applicants for licensure as a speech-language pathologist must present evidence of successful completion of the examination approved by the Board.

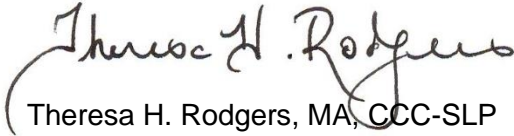
Professional experiences prior to the completion of all academic coursework and practicum may not be used or applied toward a clinical fellowship experience, which is in excess of the graduate degree.

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Given the differences in the standards for SLPAs and CFs, ASHA maintains that it is inappropriate to reimburse CFs at the same lowered rate as Assistants. ASHA welcomes the opportunity to discuss our comments and to provide any additional information that could help you in determining the most appropriate path forward. If you or your staff have any questions, please contact Laurie Alban Havens, ASHA's director of health care policy, Medicaid and private health plans, at lalbanhavens@asha.org.

Sincerely,



Theresa H. Rodgers, MA, CCC-SLP
2020 ASHA President

cc: Oklahoma Speech-Language-Hearing Association

¹ American Speech-Language-Hearing Association. (2020). Oklahoma [Quick Facts]. <https://www.asha.org/uploadedFiles/Oklahoma-State-Flyer.pdf>.

² 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/>.

³ Oklahoma Board of Examiners for Speech-Language Pathology and Audiology. (2019). *Oklahoma Rules*. <https://www.ok.gov/obespa/documents/Combined%202016,%202018,%202019.pdf>