

July 24, 2020

The Honorable Alan Powell, Chairman
Regulated Industries Committee
613-B CLOB
Atlanta, GA 30334

RE: H.B. 1241

Dear Chairman Powell and Members of the Committee:

On behalf of the American Speech-Language-Hearing Association, I write to comment on H.B. 1241, which would allow the licensure of individuals providing applied behavior analysis (ABA) services, including those associated with the treatment of Autism Spectrum Disorder (ASD). As written, this legislation impedes the ability of licensed audiologists and speech-language pathologists to provide services to consumers with communication disorders.

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. Over 4,900 ASHA members reside in Georgia.¹

ASD is a complex neurobiological disorder characterized by social impairment, communication difficulties, and repetitive and stereotyped behaviors for which speech-language pathologists (SLPs) play a critical role in assessing and treating. Social interaction and communication, speech production, understanding, and using spoken and written language are examples of neurodevelopmental functions. They are not solely "behaviors."

ASHA maintains that SLPs should be included in any comprehensive assessment and treatment for individuals with ASD because SLPs are able to prioritize intervention objectives and coordinate planning for communicative success. While ABA therapists may work on an individual's behaviors, SLPs have the educational background that enables them to focus on understanding and using language, social communication, literacy, speech production, and augmentative and alternative communication.

Individuals with communication disorders and their families must be provided with a full complement of services designed to meet their individual needs. Allowing individuals without the appropriate education and training to make assessment decisions about an individual's communication needs may result in an inaccurate assessment and inappropriate recommendations for services to the family. Utilizing a team of qualified professionals including physicians, mental health professionals, behavioral therapists, SLPs, and others will ensure that an individual diagnosed with ASD will have a comprehensive assessment and receive the full complement of services necessary to meet their unique needs.

To address these concerns, ASHA offers the following amendments to H.B. 1241:

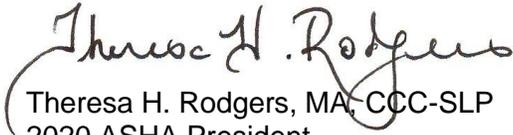
- in Section 43-7A-2 (8), add communication assessment and treatment to the list of services that are not the practice of ABA; and

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- in Section 43-7A-7, add audiologists and speech-language pathologists to the list of providers that the Act would not apply to.

Thank you for your consideration of ASHA's position and recommended amendments to H.B. 1241. If you or your staff have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at tboyd@asha.org.

Sincerely,



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

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