



July 21, 2021

House Committee on Health
544 Legislative Office Building
16 West Jones Street
Raleigh, NC 27601

RE: HB 434

Dear Members of the Committee on Health:

On behalf of the American Speech-Language-Hearing Association, I write to share strong concerns with HB 434, as written, regarding the licensure and regulation of music therapists.

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 6,600 ASHA members reside in North Carolina.¹

ASHA maintains that although a music therapist may work with an individual who has a communication disorder, music therapists are not qualified to treat the communication disorder itself, which falls under the scope of practice of a speech-language pathologist (SLP). Therefore, ASHA requests that the following provisions be added to the definition of “music therapy”, Section 90-730-21:

A person may not represent to the public by title, by description of services, methods, or procedures, or otherwise that the person:

- (1) Is authorized to practice speech–language pathology in this State; or
- (2) Evaluates, examines, instructs, or counsels individuals suffering from disorders or conditions that affect speech, language, communication, and swallowing.

This section may not be construed to prohibit an individual certified under Section 90-730.24 to engage in the practice of music therapy from representing to the public that the individual may work with a client who has a communication disorder and address communication skills.

ASHA also requests that the following provisions be added to Section 90-730-27, “North Carolina Certified Music Therapist,” as follows:

A person certified under Section 90-730.24 as a North Carolina Certified Music Therapist may not use any word or term connoting professional proficiency in speech-language pathology, including but not limited to:

- (1) “Communication disorders”;
- (2) “Communicologist”;
- (3) “Dysphagist”;
- (4) “Language pathologist”;
- (5) “Logopedist”;

- (6) "Speech and language clinician";
- (7) "Speech and language therapist";
- (8) "Speech clinic";
- (9) "Speech clinician";
- (10) "Speech correction";
- (11) "Speech correctionist";
- (12) "Speech pathology";
- (13) "Speech-language pathology";
- (14) "Speech therapist";
- (15) "Speech therapy"; or
- (16) "Swallowing therapist".

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 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.

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

- 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.

Music Therapy vs. Speech-Language Pathology Training Program

Although the American Music Therapy Association's scope of practice for music therapy was revised in 2015, it did not address the treatment of communication disorders.³ The scope of practice continues to indicate that music therapists are qualified to treat communication disorders.

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 includes the option to take the courses indicated below. **The core training for music therapy, which requires only a bachelor's degree to treat communicative and cognitive disorders, is minimal, provides only an overview of communication disorders, and 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• language acquisition• disorders of speech sounds• communication for individuals with autism	Introduction to speech and hearing process disorders
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

Thank you for your consideration of ASHA's position and requested amendment to HB 434. 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,



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

¹ American Speech-Language-Hearing Association. (2020). *North Carolina* [Quick Facts].
<https://www.asha.org/siteassets/uploadedfiles/North-Carolina-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 American Music Therapy Association. (2015). *Scope of Music Therapy Practice*.
https://www.musictherapy.org/about/scope_of_music_therapy_practice/.