



Submitted via e-mail: hbryan@senate.ms.gov

March 2, 2020

The Honorable Hob Bryan
Chairman
Senate Public Health & Welfare Committee
Room: 212-C
P.O. Box 1018
Jackson, MS 39215

RE: SB 2812

Dear Chairman Bryan:

On behalf of the American Speech-Language-Hearing Association, I write to express strong support for SB 2812, which would create a single license for audiologists and for speech-language pathologists. This legislation would also establish an independent State Board of Examiners for Audiology and Speech-Language Pathology to oversee these professions.

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 1,800 ASHA members reside in Mississippi.

Mississippi currently has two regulatory bodies that oversee the professions. The Professional Licensure Division within the State Department of Health regulates those who work in health care settings; the State Department of Education both regulates those who work in schools, and provides teacher certification. By creating a single license for audiologists and speech-language pathologists, SB 2812 strengthens consumer protection while improving regulatory efficiency by establishing one licensing body over the practice of the professions.

The current structure is too broad to adequately protect consumers of speech and hearing services in the state, and does not properly incorporate professionals with expertise in audiology and speech-language pathology onto the board itself. Most states regulate audiology and speech-language pathology using a regulatory board consisting of members of the professions and consumers. In fact, 41 states have such a regulatory board to ensure that quality standards of practice are maintained and instances of harm are promptly investigated.^{1 2}

Under SB 2812, the Department of Health's regulatory responsibilities for audiology and speech-language pathology would be reorganized under the new State Board of Examiners for Audiology and Speech-Language Pathology. This new independent board would be made up of experts in each field and include a consumer representative. This reorganization will not create

¹ ASHA analysis of state statutes and state audiology and speech-language pathology practice acts.

² National Council of State Boards of Examiners (2019). *Reference Manual: Licensure and Regulation in Speech-Language Pathology and Audiology*. <http://www.ncsb.info/publications>

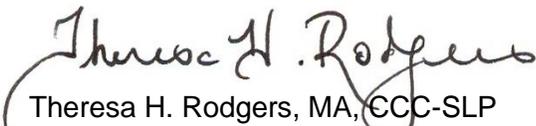
new regulatory hurdles for persons seeking to enter the professions, and will not create new hurdles for consumers seeking access to speech and hearing services.

Under SB 2812, universal licensure also:

- ensures that only speech-language pathologists with the appropriate qualifications and training can provide speech-language pathology services;
- deters the hiring or substitution of other workers who do not have the necessary, accurate, and/or appropriate education, qualifications, and training;
- provides job portability allowing those who are qualified for full licensure to work in all settings;
- enhances recruitment of Clinical Fellows and other professionals;
- deters unethical behavior from professionals and employers, such as under/over utilization, fraud and misrepresentation;
- allows a venue for practicing professionals to express concerns regarding those who may be engaged in unethical or fraudulent practice;
- provides a venue for consumers to seek censure of individuals who have committed malpractice or other unethical behavior;
- provides the necessary authority to intervene in cases of provider misconduct; and
- increases accessibility to and reimbursement from third party payer sources who stipulate that only licensed/regulated professionals participate in their plans.

Thank you for your consideration of ASHA's position on SB 2812. 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