



September 28, 2020

Ms. Elena Kemp
Regulatory Coordinator
Colorado Department of Regulatory Agencies
Division of Professions and Occupations
1560 Broadway, Suite 1350
Denver, CO 80202

RE: Comments on Supporting Continued Regulation of Audiologists

Dear Ms. Kemp:

On behalf of the American Speech-Language-Hearing Association, I write to support continuing the regulation of audiologists via licensure.

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 4,000 ASHA members reside in Colorado.¹

Licensure and ASHA Certification

Both licensure and ASHA certification help ensure the quality provision of audiology services. State licensure provides consumer protection and recourse against incompetent practitioners and/or those acting in an unethical manner so that they may be removed from practice. In Colorado, continuing professional competency may be shown through participating in the Continuing Professional Development Program; participating in a program of continuing professional competency through an accrediting body or an entity approved by the Director; or by receiving an exemption for military service.

ASHA's Certificate of Clinical Competence (CCC) is the fundamental standard among major health professions and the most widely recognized symbol of competency for audiologists (CCC-A) and SLPs (CCC-SLP). ASHA's Certificate of Clinical Competence (CCC) is the fundamental standard among major health professions and the most widely recognized symbol of competency for audiologists (CCC-A). To maintain their CCC, audiologists must accumulate 30 professional development hours every three years. Individuals holding the CCC are expected to abide by ASHA's Code of Ethics. While, certification is important for internal professional recognition and external accountability, licensure is important to legally work and provides minimum standards of competency that protect the public from harm.

Audiology Professional Qualifications

Audiologists earn a clinical doctoral degree and are highly qualified to conduct comprehensive assessments that determine hearing loss, auditory function, balance and

September 28, 2020

Page 2

related systems, and evaluate, select, and dispense hearing aids. Audiologists also assess the candidacy of individuals with hearing loss for cochlear implants and work with medical teams to provide fitting, mapping, and audiologic rehabilitation to optimize the use of these devices. These educational requirements, combined with the maintenance of licensure, will ensure that consumers in Colorado continue to receive services from the highest qualified providers.

Thank you for your consideration of ASHA's comments supporting the continuing regulation of audiologists. 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 black ink that reads "Theresa H. Rodgers". The signature is written in a cursive style with a large initial "T".

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

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