February 12, 2019

The Honorable Gerald Ortiz y Pino
400 12th Street NW
Albuquerque, NM 87102

RE: Senate Bill 387

Dear Senator Ortiz y Pino:

On behalf of the American Speech-Language-Hearing Association, I write to oppose SB 387, which could lead to the elimination or lessening of requirements for licensure of audiologists and speech-language pathologists (SLPs) in New Mexico and impact their ability to participate in an interstate compact.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 1,400 of our members reside in New Mexico.

Regulatory oversight, which is legislated through occupational licensure, is the accepted practice for consumer protection. Consumers rely on the expertise of staff in the Regulation and Licensing Department to ensure that those in practice are held to the highest standards of the profession. ASHA urges you to continue to require licensure for both audiologists and SLPs through this Department.

ASHA also opposes the removal of licensure from these professions because of the impact on the ability to participate in speech-language-hearing interstate compact (Section 1, B, (3)). The removal of licensure from these professions, or a reduction from this standard, would prevent these professions from participating in a national interstate compact.

Licensure and ASHA Certification

Both licensure and the ASHA’s Certificate of Clinical Competence (CCC) help ensure the quality provision of audiology and speech-language pathology 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. ASHA certification is the fundamental standard among major health professions and the most widely recognized symbol of competency for audiologists (CCC-A) and SLPs (CCC-SLP). To maintain their CCC, audiologists and SLPs must accumulate 30 professional development hours every three years. Individuals holding the CCCs 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.

Background on Audiology and Speech-Language Pathology

Audiology Professional Qualifications

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

Speech-Language Pathology Professional Qualifications
SLPs are highly skilled professionals who, at minimum, hold a master’s degree in communication disorders from an accredited program recognized by the U.S. Department of Education. SLPs complete a challenging education and training program, a supervised clinical fellowship, and must pass a nationally standardized examination. SLPs assess and treat a variety of communication disorders involving speech, language, fluency (e.g., stuttering), voice and resonance problems, cognitive communication disorders such as memory, attention and problem-solving disorders, and swallowing and associated feeding disorders. SLPs provide services in a variety of practice settings ranging from schools to institutions such as hospitals and rehabilitation centers, early intervention programs, and private practice.

Thank you for the opportunity to convey the critical importance that licensure of health care professionals has on ensuring patient safety and consumer protection. If you or your staff have any questions, please contact Eileen Crowe, ASHA’s director of state association relations, at ecrowe@asha.org.

Sincerely,

Shari C. Robertson, PhD, CCC-SLP
2019 ASHA President