March 12, 2019

The Honorable Timothy D. Hawkes
Chair, House Rules Committee
442 S. 225 E
Centerville, UT 84014

Re: Senate Bill 203

Dear Chairman Hawkes:

On behalf of the American Speech-Language-Hearing Association, I write to express our opposition for SB 203, which allows physician assistants to engage in the practice of audiology and speech-language pathology, infringing on the scope of practice of audiologists and speech-language pathologists.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 204,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audioligic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech and language problems, including swallowing disorders. Over 1,500 ASHA members reside in Utah.

ASHA maintains that physician assistants do not possess the specialized education and training to treat communication disorders.

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 audioligic 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.

**ASHA Certification**

Audiologists and SLPs may also possess ASHA’s Certificate of Clinical Competence (CCC), a fundamental standard among major health professions and the most widely recognized symbol of competency for audiologists (CCC-A) and SLPs (CCC-SLP). Individuals holding the CCCs are expected to abide by ASHA’s Code of Ethics. To maintain their CCCs, audiologists and SLPs must accumulate 30 professional development hours every three years.

We appreciate your consideration of our position on SB 203, and our position on the need to restrict physician assistants from engaging in the practice of audiology and speech-language pathology. 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 B. Robertson, PhD, CCC-SLP
2019 ASHA President