



May 9, 2019

Erin K. Haag, Executive Director
Board of Examiners for Speech-Language Pathology & Audiology
800 NE Oregon St., Suite 407
Portland, OR 97232-2187

RE: Proposed SLPA Regulations

Dear Ms. Haag:

On behalf of the American Speech-Language-Hearing Association, I write to provide comments on the proposed regulations for speech-language pathology assistants (SLPAs).

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. Over 2,200 ASHA members reside in Oregon.

Recommendations

Section 335-095-0010: Definitions

(1) Includes “a certificate of completion in speech-language pathology assisting.” It is not clear what educational standard would need to be met for this certificate and who would offer the certificate. ASHA would not recommend an educational standard below the associate degree in speech-language pathology assisting and would recommend deleting this certificate if it is a lower standard.

(5) Direct Supervision: ASHA recommends maintaining the original language deleted on pages 5 and 6 Section 335-095-0050, Requirements for Supervising Licensed Speech-Language Pathology Assistants (1) (a) and (b) that defines supervision, and the minimum percentages, during the first 90 calendar days of licensed employment and supervision after the first 90 calendar days of licensed employment. ASHA also recommends adding the following to this definition “Direct supervision does not include reviewing a taped session at a later time.”

(6) Consultative Supervision: ASHA recommends retaining the deleted term “indirect supervision” and deleting “consultative.” “Indirect supervision” is the term used in many states and is less confusing to the consumer and practitioner.

(7) Medically Fragile: ASHA recommends adding the following to this definition “One hundred percent direct supervision of speech-language pathology assistants is required when treating medically fragile students, patients, or clients.”

Section 335-095-0030: Certification of Speech-Language Pathology Assistants

- (1) Per (1) in definitions, delete “certificate of completion in speech-language pathology assisting” if this standard is lower than an associate degree in speech-language pathology assisting.
- (2) (a) and (b) ASHA notes here that if the clinical fieldwork is done on the job, then the provisional certificate applies. Otherwise, if the clinical fieldwork is done during the degree requirements, then the speech-language pathology assistant should be able to apply directly for the license.
 - (f) ASHA recommends adding “in speech-language pathology” after the ASHA Certificate of Clinical Competence.

Section 335-095-0040: Qualifications for Supervising Speech-Language Pathology Assistants

- (1) (a) ASHA recommends deleting “the clinical post-graduate fellowship year may be counted as one year of professional experience” as we believe only the two years of professional speech-language pathology work experience following completion of the graduate degree and the clinical post-graduate fellowship is appropriate to count for professional experience.

Section 335-095-0050: Requirements for Supervising Licensed Speech-Language Pathology Assistants

- (1) (a) and (b) ASHA recommends deleting these and maintaining the previous higher standard of supervision noted in the direct supervision definition.
 - (4)(a) Delete the term “consultative” and insert previously used term “indirect.”
 - (6) (a) and (b) ASHA recommends removing the one-year exemption from certain requirements for supervision of certified speech-language pathology assistants as well as the exemption language in (a) and (b) for remote supervision and allowing four full-time equivalent certified speech-language pathology assistants. ASHA recommends no more than two full-time equivalent speech-language pathology assistants in any setting.

Section 335-095-0060

Scope of Duties for the Speech-Language Pathology Assistant

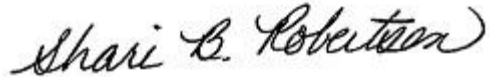
- (1) (b) ASHA recommends adding “while under 100 percent supervision” by the supervising speech-language pathologist for those treating these categories of students, patients, and clients.

Not in Scope of Duties

- (2) (c) ASHA recommends adding “or other designated speech-language pathologist” in addition to the supervising speech-language pathologist.
 - (2) Add an (n) Design or select augmentative and alternative communication systems or devices.

We appreciate your consideration of ASHA's comments on the proposed regulation of speech-language pathology assistants. 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 cursive script that reads "Shari B. Robertson".

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