



Submitted via email: va.nsp@va.gov

September 29, 2023

Department of Veterans Affairs
810 Vermont Ave NW
Washington, DC 20571

RE: National Standards of Practice (NSP) Listening Session for Audiologists and Speech-Language Pathologists

To Whom it May Concern:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to provide feedback on the Department of Veterans Affairs' National Standards of Practice Listening Session for the professions of audiology and speech-language pathology.

ASHA is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids and implantable hearing devices. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, swallowing, and cognitive-communication disorders.

Audiologists and SLPs are autonomous licensed professionals who work directly with clients, patients, and students making independent judgments regarding the assessment and treatment of an individual's communication disorder. Audiologists earn a clinical doctoral degree, complete over 1,800 hours of clinical training, complete a final year externship, and must pass a national standardized exam. SLPs are highly skilled professionals with a minimum of a master's degree in communication disorders, completion of 400 hours of clinical experience, completion of a 36-week/1,260-hour clinical fellowship, and passage of a nationally standardized examination.

The independent practice of audiology and speech-language pathology is fully supported by state licensing entities in all 50 states and the District of Columbia. Each of these jurisdictions requires a license to practice with state requirements mirroring ASHA's Certificate of Clinical Competence (CCC).

ASHA's CCC is the fundamental standard among major health professions, many public and private payers, and is the most widely recognized symbol of competency for audiologists (CCC-A) and SLPs (CCC-SLP). Individuals holding the CCCs are expected to complete a minimum of 30 professional development hours every 3 years and abide by ASHA's Code of Ethics. **We encourage the Department of Veterans Affairs (VA) to adopt ASHA's requirements as the National Standards of Practice for audiologists and SLPs.**

The VA listening session was valuable to ASHA staff and members. There was a comment made by an American Medical Association representative that national standards of practice might allow audiologists and SLPs to work outside of the supervision of a physician. This is true, as audiologists and SLPs are independent practitioners, who are not subject to supervision by a physician, and have distinct scopes of practice separate from physicians. Providing direct access to services for consumers is the standard in the field and among most other payers and

programs. Audiologists and SLPs work with physicians in an interprofessional collaborative practice model to provide comprehensive, integrated services, developing and implementing a treatment plan collaboratively as a team. Referral to a physician is a first step for any patient with whom an audiologist or SLP consults if risk factors are present. In a 2019 survey, 70% of audiologists and 83.8% of SLPs in health care said they had engaged in interprofessional collaborative practice in their primary work setting.¹

Thank you for considering ASHA's comments on the VA National Standards of Practice Listening Session for the professions of audiology and speech-language pathology. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,



Robert M. Augustine, PhD, CCC-SLP
2023 ASHA President

¹ American Speech-Language-Hearing Association, (2019). *Interprofessional Practice Survey*.
<https://www.asha.org/siteassets/surveys/2019-interprofessional-practice-survey-results.pdf>.