

August 21, 2025

Dr. Joseph C. Barrow, Jr.
Executive Secretary
Georgia Professional Standards Commission
200 Piedmont Avenue
Suite 1716
Atlanta, GA 30334-9032

RE: Speech-Language Associate Regulations

Dear Dr. Barrow:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to comment in opposition to the proposed speech-language associate certification changes and to recommend amendments.

ASHA is the national professional, scientific, and credentialing association for 241,000 members, certificate holders, and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology assistants; and students. Over 6,000 ASHA members reside in Georgia.¹

Rule 505-2-151

ASHA opposes the language in Section 4, 1, which allows an individual with a five-year induction certificate “in any field at the bachelor’s level or higher” to be granted a certificate in speech-language associate. These individuals would not have the necessary specialized training, indicated below, that is needed to treat students with communication disorders.² The lack of training also places additional supervisory demands on SLPs.

ASHA recommends that the education requirement in Section 2, 1. (i) of a state-approved certification preparation program at the bachelor's degree level be amended. At this time, there are very few speech-language pathology assistant specific bachelor's programs available. Therefore, we propose the following three educational pathway options in its place:

- A two-year degree in a speech-language pathology assistant program from an accredited institution; or
- A bachelor’s degree in speech-language pathology or communication disorders from an accredited institution; or
- A college degree in another field from an accredited institution with coursework in the following areas:
 - Introductory or overview course in communication disorders
 - Phonetics
 - Speech sound disorders
 - Language development
 - Language disorders
 - Anatomy and physiology of speech and hearing mechanisms.

In addition to the above-mentioned educational requirements, SLPAs should be required to complete clinical hours that would give them hands on experience outside of a classroom. For reference, ASHA's SLPA scope of practice recommends a minimum of 100 hours of clinical experience.³ We recommend adding language requiring clinical experience hours with an option to complete these hours via a clinical practicum or on the job under the supervision of a licensed SLP who either holds the Certificate of Clinical Competence or meets equivalent standards.

In an effort to promote consistency across the U.S., ASHA recommends using the term "speech-language pathology assistant" (SLPA) in place of "speech-language associate." SLPA is a more commonly used term throughout the country and helps with reciprocity for these professionals coming from other states. SLPA is also the typical designator nationwide for those with an associate's degree or higher.

To further support standards for SLPAs across the U.S., we recommend that the SLPA scope of practice to be consistent with ASHA's, as well as the supervision ratio and continuing education requirements. ASHA's scope of practice recommends that an SLP not supervise or be listed as a supervisor for more than three full-time equivalent SLPAs in any setting.⁴

We also recommend adding title protection language for the SLPA stating:

"No person shall hold themselves out to be, or use the title speech-language pathology assistant, unless they are certified by GaPSC to practice as such."

Lastly, we recommend requiring passage of an exam. We acknowledge that it is currently specified under the provisional certificate but has not yet been developed.

Thank you for considering ASHA's comments on the speech-language associate regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state education affairs, at ecrowe@asha.org.

Sincerely,



A. B. Mayfield-Clarke, PhD, CCC-SLP
2025 ASHA President

¹ American Speech-Language-Hearing Association. (2024). *Georgia* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-flyers/georgia-state-flyer.pdf>

² American Speech-Language-Hearing Association. (2016). *Scope of Practice in Speech-Language Pathology*. <https://www.asha.org/policy/sp2016-00343/>

³ American Speech-Language-Hearing Association. (2022). *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <https://www.asha.org/policy/slpa-scope-of-practice/>

⁴ Ibid