



1925-2025
Legacy. Impact. Possibilities.

August 7, 2025

Kelli Moss, Executive Director
Board of Audiology and Speech-Language Pathology
9960 Mayland Drive
Suite 300
Henrico, VA 23233

RE: Petition for Rulemaking to Remove Supervised Professional Experience

Dear Ms. Moss:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to oppose the petition to remove the supervised professional experience required by the Board of Audiology and Speech-Language Pathology to qualify for a speech-language pathologist (SLP) license.

ASHA is the national professional, scientific, and credentialing association for 241,000 members, certificate holders, and affiliates who are audiologists; SLPs; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. SLPs identify, assess, and treat speech, language, swallowing, and cognitive disorders. Over 5,170 ASHA members reside in Virginia.¹

Recently, the Centers for Medicare & Medicaid Services (CMS) updated Chapter 15 of the Medicare Benefit Policy Manual to revise the definition of a qualified SLP for Part B (outpatient) services. This update recognized only fully licensed SLPs and excluded those with provisional license from enrolling and billing Medicare for outpatient services, which could have threatened access to care for Medicare patients. However, last week CMS notified ASHA it is reversing its previous interpretation²:

“After further review of our prior statement about ‘provisional’ licenses for clinical fellows as well as the CY 2015 Home Health final rule (79 FR 66107), for Part B outpatient services furnished by speech-language pathologists, we now believe that deferring to the state licensure requirements for SLPs in each state would allow them to determine the SLPs that are most appropriate to provide speech-language pathology services to individuals/patients, including Medicare beneficiaries. In other words, to the extent that an SLP complies with the applicable state process for licensure, certification, or registration (if the state has one) necessary to practice as an SLP, which may include provisional or temporary licensure as such individual completes required supervised experience, such individual complies with the applicable licensure requirements found at 1861(II)(a)(4)(A) of the Social Security Act and 42 CFR 410.62(a), 42 CFR 484.115(n) and Section 230.3 of Ch. 15 of the Medicare Claims Processing Manual.”

The reversal of CMS’ previous interpretation eliminates the need to move forward with this petition for rulemaking.

Additionally, removal of the requirement for a supervised professional experience would put the Commonwealth out of compliance with HB 2033 (2023), which adopted the Audiology & Speech-Language Pathology Interstate Compact (ASLP-IC). Section 54.1-2608 requires that participation in the compact include a “supervised postgraduate professional experience as required by the Commission.” If Virginia were to remove the supervised professional experience, the Commonwealth would likely be found out of compliance and unable to participate in the ASLP-IC.

Thank you for your consideration of ASHA’s position. 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,

A handwritten signature in cursive script that reads "A. B. Mayfield-Clarke".

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

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

² American Speech-Language-Hearing Association. (2025, Jul 29). *CMS Reverses Its Interpretation of a Qualified SLP: Clinical Fellows Cleared to Bill Medicare*. <https://www.asha.org/news/2025/cms-reverses-its-interpretation-of-a-qualified-slp-clinical-fellows-cleared-to-bill-medicare/>