



ASHA
American
Speech-Language-Hearing
Association

August 31, 2022

Dr. Erica Hernandez-Scott
Interim, Executive Director
Professional Educator Standards Board
PO Box 47236
Olympia, WA 98504-7236

RE: Proposed Conditional Certificates

Dear Dr. Hernandez-Scott:

On behalf of the American Speech-Language-Hearing Association, I write to express strong opposition to proposed regulations that would allow educational audiologists and school-based speech-language pathologists to obtain a conditional certificate with a bachelor's degree or higher.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 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 audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, and swallowing disorders. Over 3,900 ASHA members reside in Washington.¹

ASHA understands the need to address shortages in school settings. However, ASHA is concerned that individuals with a conditional certificate may not possess sufficient education, training, and skills to provide efficacious services to children. ASHA is also concerned that this credential may be renewed twice for those enrolled in a master's program.

SLPs possess adequate skills and training to assess and treat communication disorders in children. Lowering the educational standard for SLPs could lead to patients experiencing physical injuries, illness (especially with feeding and swallowing disorders), increased treatment time, or exacerbated problems (especially when proper treatment is delayed and critical time periods are missed). Audiologists earn a clinical doctoral degree and are highly qualified to conduct comprehensive assessments that determine 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 audiologic rehabilitation to optimize the use of these devices.

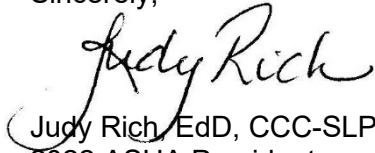
ASHA maintains that incentives, such as salary supplements would be an alternative and effective means to recruit and retain highly qualified audiologists and SLPs in school settings. Many school districts already provide salary supplements to practitioners who hold a Certificate of Clinical Competence.²

In addition to the use of salary supplements, ASHA supports the use of appropriately supervised speech-language pathology assistants (SLPAs) who possess their certification from the

Washington State Department of Health. Practitioners throughout the country successfully work in conjunction with SLPAs to provide services in a variety of practice settings.

Thank you for helping to ensure that the children of Washington continue to receive the highest standard of care. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at ecrowe@asha.org.

Sincerely,

A handwritten signature in black ink that reads "Judy Rich". The signature is written in a cursive style with a large, looping initial "J".

Judy Rich, EdD, CCC-SLP, BCS-CL
2022 ASHA President

¹ American Speech-Language-Hearing Association. (2022). *Washington* [Quick Facts].

<https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/washington-state-flyer.pdf>.

² American Speech-Language-Hearing Association. (n.d.). *Local District Salary Supplement by State*.

<https://app.powerbi.com/view?r=eyJrIjoiTG5YTM3YTctZjA1MC00MWZjLTgyMDItZmE0M2Q1NWU3Y2NlIiwidCI6IjBhMDY4NWVmLWNIMjgtNGlyZC05ZGFmLTExNjlyYzc3ODc4YyIsImMiOiJF9>.