



June 17, 2024

The Honorable Russell Huxtable
Delaware Senate
411 Legislative Ave.
Dover, DE 19901

Note: ASHA also sent this letter to the following Delaware representatives:

- The Honorable Stell Parker Selby, Delaware House of Representatives

RE: SB 320: SLPA Licensure

Dear Senator Huxtable:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to express support, with recommended amendments, for SB 320, which licenses speech-language pathology assistants (SLPAs).

ASHA is the national professional, scientific, and credentialing association for 234,000 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 600 ASHA members reside in Delaware.¹

ASHA believes that using appropriately trained and supervised SLPAs can significantly alleviate SLP shortages. Without the support of speech-language professionals, individuals with communication and related disorders might not be able to achieve their full academic, social, and emotional potential.

We support existing language in the statute requiring licensed, supervising SLPs to have their ASHA Certificate of Clinical Competence. ASHA also supports the proposed language requiring the licensed SLPA to possess the Speech-Language Pathology Assistants Certification (C-SLPA), which sets standards for the profession.² Several other states are also using ASHA's Assistant Certification program as a pathway to meeting some (or all) of their state requirements.³

Section 3702 Definitions (13)

We recommend adding language consistent with ASHA's SLPA scope of practice for the ratio of SLPs to SLPAs.⁴ Our scope recommends that the SLP not supervise or be listed as a supervisor for more than three full-time equivalent SLPAs in any setting. ASHA also recommends adding the following language to the proposed scope section:

“The amount and type of supervision required must be based on (a) the needs, competencies, skills, expectations, philosophies, and experience of the SLPA and the supervisor; (b) the needs of students, patients, and clients served; (c) the service setting; (d) the tasks assigned; and (e) other factors.”

We suggest additional language—including requiring 100% direct supervision if an SLPA is treating medically fragile students, patients, and clients and prohibiting an SLPA from selecting an augmentative and alternative communication device.⁵

ASHA also recommends adding the following language, which is consistent with ASHA's SLPA scope:

"Demonstrating strategies included in the feeding and swallowing plan developed by the SLP and share information with students, patients, clients, families, staff, and caregivers and assisting students, patients, and clients with feeding and swallowing skills developed and directed by the SLP when consuming food textures and liquid consistencies."

Telesupervision

We recommend adding language to permit the use of telesupervision with appropriately supervised SLPAs using real-time telecommunication.

Section 1 SLP Terminology

ASHA recommends amending the term "speech/language pathologist" throughout this section to "speech-language pathologist," which is a more commonly used format in states.

Thank you for considering ASHA's recommendations to SB 320. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,



Tena L. McNamara, AuD, CCC-A/SLP
2024 ASHA President

¹ American Speech-Language-Hearing Association. (2023). *Delaware* [Quick Facts].

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

² American Speech-Language-Hearing Association. (n.d.). *Become a Certified Speech-Language Pathology Assistant (SLPA)*. <https://www.ashaassistants.org/pathways-speech-language-pathology-assistant/>

³ American Speech-Language-Hearing Association. (n.d.). *Assistants Certification Recognition in States*. <https://app.powerbi.com/view?r=eyJrIjoiODdjMmM2MjEtYWQxNS00MmJkLTk1MjMtODAwZWY0NDY1ZDI2liwidCI6IjBhMDY4NWFmLWNiMjgtNGlyZC05ZGFmLTUyYzYzODc4YyIsImMiOiF9>

⁴ American Speech-Language-Hearing Association. (n.d.). *SLPA Supervision*.

<https://www.asha.org/practice/supervision/slpa-supervision/#slp>

⁵ American Speech-Language-Hearing Association. (n.d.). *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <https://www.asha.org/policy/slpa-scope-of-practice/>