



July 9, 2025

Chair Timothy Hunsaker and Board Nevada Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board 6170 Mae Anne Avenue, Suite 1 Reno, NV 89523

RE: Speech-Language Pathology Assistant Regulations

Dear Chair Hunsaker:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to comment in support of the proposed regulations to license speech-language pathology assistants (SLPAs).

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 1,100 ASHA members reside in Nevada.<sup>1</sup>

Between 2022 and 2032, Nevada is expected to have a 26% increase in demand for SLPs.<sup>2</sup> We believe licensing appropriately trained and supervised SLPAs can help to address this increased demand, alleviate staff shortages, and tackle the critical needs of those with communication and related disorders. As such, we offer the following recommended changes to the proposed legislation.

#### In NAC 637B., ASHA recommends the following amendments:

## Speech-language pathology assistant: clinical training experience.

- ASHA recommends substituting "educational institution" with "accredited institution" in the following section:
  - "1. An applicant for a license to practice as a speech-language pathology assistant who is a new graduate holding a bachelor's degree or master's degree in speech-language pathology or communication sciences and disorders awarded by an educational institution and does not currently or has not previously held a license as a speech-language pathology assistant issued by the District of Columbia or any state or territory of the United States must provide one of the following with the application for licensure."
- ASHA supports the proposed option of the clinical training experience to be completed by meeting the requirements for the Speech-Language Pathology Assistants Certification (C-SLPA) as a pathway and the option of clinical training on the job.<sup>3</sup> However, ASHA's SLPA scope of practice requires 100 hours of supervised clinical experience (80 direct, 20 indirect) under the direct supervision of an ASHA-

certifed SLP for its SLPA certification. For this section, ASHA recommends the following language:

"(b) Proof satisfactory of 75 hours of clinical training, made up of at least 25 hours of clinical observation experience and 50 hours of clinical assisting experience obtained while earning Certification as a Speech-Language Pathology Assistant through the American Speech-Language-Hearing Association."

### Speech-language pathology assistant: clinical training plan.

- ASHA recommends increasing the direct supervision listed below from 25% to 100%, as part of the clinical training plan because most academic programs implement this requirement.
  - "3. All hours worked by the licensed speech-language pathology assistant must be under the direct supervision of the licensed supervising speech-language pathologist identified in the Clinical Training Plan. Direct supervision must total no less than 25% of the speech-language pathology assistant's total contact with each client/patient."
- In the section below, ASHA recommends extending the clinical training plan completion timeline from 60 to 90 days to allow the SLP supervisor greater flexibility.
  - "4. Clinical Training Plan hours must be successfully completed within 60 days of the issuance of the speech-language pathology assistant license."

# Speech-language pathology assistant prohibited from performing certain activities; disciplinary action.

- ASHA believes that medically fragile clients require real time clinical judgement, immediate responses, and treatment decisions beyond the training and skill of an SLPA. Therefore, ASHA recommends that the section below specify "100%" direct supervision for medically fragile students, patients or clients.
  - "(n) Treat a medically fragile client without direct supervision."

## Other Language.

- ASHA supports the ratio recommendation for the supervising SLP to no more than two SLPAs at the same time. ASHA also supports the supervising SLP workload considerations "while maintaining the highest level of quality services." ASHA believes that the number of SLPAs who can be appropriately supervised by a single SLP will depend on a variety of factors, including caseload characteristics, SLPA experience, and SLP experience. The SLP is responsible for determining how many SLPAs they can supervise while maintaining the highest level of quality for services provided.<sup>4</sup>
- ASHA supports the telepractice options for the SLPA.<sup>5</sup>

ASHA Comments Page 3

Thank you for considering ASHA's comments on the SLPA regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at <a href="mailto:ecrowe@asha.org">ecrowe@asha.org</a>.

Sincerely,

A. B. Mayfield-Clarke, PhD, CCC-SLP

A.B. Muglield-Clarke

2025 ASHA President

<sup>&</sup>lt;sup>1</sup> American Speech-Language-Hearing Association. (2024). *Nevada* [Quick Facts]. <a href="https://www.asha.org/siteassets/advocacy/state-flyers/nevada-state-flyer.pdf">https://www.asha.org/siteassets/advocacy/state-flyers/nevada-state-flyer.pdf</a>

<sup>&</sup>lt;sup>2</sup> Ibid.

<sup>&</sup>lt;sup>3</sup> Council for Clinical Certification in Audiology and Speech-Language Pathology of the American Speech-Language-Hearing Association. (2020). *2020 Standards for ASHA Speech-Language Pathology Assistants Certification*. https://www.asha.org/certification/2020-slpa-certification-standards/

<sup>&</sup>lt;sup>4</sup> American Speech-Language-Hearing Association. (2022). *Scope of Practice for the Speech-Language Pathology Assistant (SLPA)*. <a href="https://www.asha.org/policy/slpa-scope-of-practice/">https://www.asha.org/policy/slpa-scope-of-practice/</a>
<sup>5</sup> Ibid.