



February 6, 2025

The Honorable Elizabeth Thomson House of Representatives P.O. Box 27654 Albuquerque, NM 87125

RE: HB 180

Dear Representative Thomson:

On behalf of the American Speech-Language-Hearing Association (ASHA), I write to express support for House Bill 180, 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 1,400 ASHA members reside in New Mexico.<sup>1</sup>

#### Section 1 61-14B-2 Definitions

For A, ASHA recommends removing the term "year" after clinical fellowship. ASHA now allows the clinical fellow (CF) experience to be completed within four years from the start date of the CF.<sup>2</sup>

For L, we recommend replacing the term "impaired human hearing" with the term "hearing loss."

For O, we recommend replacing the term "speech-pathology" with the term "speech-language pathology" and applying this change throughout the bill.

For P, we recommend deleting the word "aberrant" from the practice of audiology definition.

For R, we recommend deleting the following language in red and adding the underlined language:

R. "practice of speech-language pathology" means the rendering or offering to render to individuals, groups, organizations or the public any service in speech or language pathology involving the nonmedical application of principles, methods and procedures for the measurement, testing, diagnosis, prognostication, counseling and instruction related to the development and disorders of communications communication, speech, fluency, voice, verbal and written language, auditory comprehension, cognition, dysphagia, oral, pharyngeal or laryngeal sensorimotor competencies and treatment of persons requiring use of an augmentative and alternative communication device for the purpose of nonmedical diagnosing, preventing, treating and ameliorating such disorders and conditions in individuals and groups of individuals...

For X, we recommend replacing the term "communicative disorders" with "communication disorders"

In addition to the inclusion of the language defining direct supervision in this section, we recommend adding a definition for indirect supervision. ASHA defines indirect supervision as "the monitoring or reviewing of an SLPA's activities outside of observation and guidance during direct services provided to a student, patient, or client. Indirect supervision activities performed by the supervising SLP may include, but are not limited to, demonstration, records review, review and evaluation of audio or video recorded sessions, and interactive conferences that may be conducted by telephone, email, or other forms of telecommunication" (e.g., virtual platforms).<sup>3</sup>

### Section 2 61-4B-3.3 Scope of Practice

For both A and B, ASHA recommends incorporating additional language from its SLPA scope of practice to further define areas both inside and outside of the SLPA scope.<sup>4</sup> We recommend this change be reflected throughout the bill.

For A, we recommend changing the term "appropriate supervisor" to "qualified supervisor."

### Section 3 61-14B-15.2-Requirements for Licensure

For A. (3), we recommend deleting the language in red and adding the underlined language:

of at least one hundred supervised clinical hours. under the supervision of a certified speech language pathologist. Clinical hours may be completed via a clinical practicum or on the job under the supervision of a licensed speech-language pathologist and who currently holds the Certificate of Clinical Competence or meets equivalent standards; or

# Section 5 61-14B-16.1 Expedited License

For A, ASHA recommends adding the underlined language below to better align the requirements of those coming in from other jurisdictions with those of New Mexico.

A. The board shall issue an expedited license without examination to a speech-language pathologist, speech language pathology assistant, audiologist or hearing aid dispenser licensed in another licensing jurisdiction in accordance with Section 61-1-31.1 NMSA 1978. The board shall issue the expedited license as soon as practicable but no later than thirty days after the person files an application with the required fees and demonstrates that the person holds a valid, unrestricted license and is in good standing with the licensing board in the other licensing jurisdiction. If the board issues an expedited license to a person whose prior licensing jurisdiction did not require examination, the board may require the person to pass an examination before license renewal. If the board issues an expedited license to a person whose prior licensing jurisdiction did not require clinical hours that are equivalent to those required by the board, the applicant will submit a supervisor deficiency plan for attainment of hours in the first 120 days of work prior to renewal.

## **Additional Language**

ASHA also recommends adding a new letter that provides title protection to the SLPA, which would read as follows:

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

### Summary

The telesupervison provisions in the bill, along with the recommended amendments above, will all provide additional flexibilities for both the SLPA and the SLP supervisor.

ASHA believes appropriately trained and supervised SLPAs can significantly alleviate provider shortages and help those in New Mexico with communication and related disorders.

Thank you for considering ASHA's support for House Bill 180. 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. (2023). *New Mexico* [Quick Facts]. https://www.asha.org/siteassets/advocacy/state-fliers/new-mexico-state-flyer.pdf

<sup>&</sup>lt;sup>2</sup> American Speech-Language-Hearing Association. (n.d.). *A Guide to the ASHA Clinical Fellowship Experience*. https://www.asha.org/certification/clinical-fellowship/

<sup>&</sup>lt;sup>3</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>4</sup> Ibid