



February 4, 2019

The Honorable Gilbert Keith-Agaran
Hawaii State Capitol, Room 221
Honolulu, HI 96813

Re: Senate Bill 202

Dear Senator Keith-Agaran:

On behalf of the American Speech-Language-Hearing Association, I write to express strong support for maintaining current licensure requirements for audiologists and speech-pathologists as part of the program evaluation and oppose the proposed repeal of June 30, 2022 for these professions.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 198,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 500 of our members reside in Hawaii.

Regulatory oversight legislated through licensure is the accepted practice for consumer protection. Regulatory boards, including audiology and speech-language pathology boards in all 50 states and the District of Columbia, consist of a majority of practitioners of the profession being regulated and a substantial minority of consumers of the services provided by the regulated profession. The practitioners ensure that board decisions are soundly based on the technical and scientific knowledge required to practice, as applied to individual patient care situations. The public can rely on the expertise and wisdom of practicing professionals to ensure that those in practice are held to the highest standards of the profession. **Therefore, ASHA urges you to continue to require licensure for both audiologists and speech-language pathologists through the Board of Speech Pathology and Audiology under the Department of Commerce and Consumer Affairs.**

Background on Audiology and Speech-Language Pathology

Audiology Professional Qualifications

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.

Speech-Language Pathology Professional Qualifications

Speech-language pathologists (SLPs) are highly skilled professionals who, at minimum, hold a master's degree in communication disorders from an accredited program recognized by the U.S. Department of Education. SLPs complete a challenging education and training program, a supervised clinical fellowship, and must pass a nationally standardized examination. SLPs assess, treat, and help prevent a variety of communication disorders

involving speech, language, fluency (e.g., stuttering), voice and resonance problems, cognitive communication disorders such as memory, attention and problem-solving disorders, and swallowing and associated feeding disorders. SLPs provide services in a variety of practice settings ranging from schools to institutions such as hospitals and rehabilitation centers, early intervention programs, and private practice.

ASHA Certification: Certificate of Clinical Competence

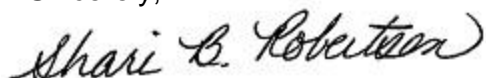
ASHA certification ensures competencies for audiologists and speech-language pathologists. The Certificate of Clinical Competence (CCC) is earned through a voluntary certification process; therefore, the requirements of certificate holders are only applicable to those who choose to be certified. ASHA has no legal recourse against those who violate the ASHA Code of Ethics other than to revoke their certification. In the absence of state authority over the practice of audiology and speech-language pathology, an individual may continue to practice despite unethical or incompetent service. To maintain their certification, audiologists and SLPs must complete professional development activities every three years.

Licensure and ASHA Certification

Both licensure and ASHA certification help ensure the quality provision of audiology and speech-language pathology services. State licensure provides consumer protection and recourse against incompetent practitioners and/or those acting in an unethical manner so that they may be removed from practice. ASHA's certification is the fundamental standard among major health professions and the most widely recognized symbol of competency for audiologists (CCC-A) and speech-language pathologists (CCC-SLP). Individuals holding the CCCs are expected to abide by ASHA's Code of Ethics. While licensure is important for internal professional recognition and external accountability, licensure is necessary to ensure that providers maintain minimum standards and the public is protected from harm.

We appreciate your consideration of our position concerning Senate Bill 202, and our position on the critical importance that licensure of health care professionals plays in ensuring patient safety and consumer protection. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director of state association relations, at ecrowe@asha.org.

Sincerely,



Shari B. Robertson, PhD, CCC-SLP
2019 ASHA President